

**MINING AND RECLAMATION PLAN
SUFCO MINE
AMENDMENT**

OPERATED BY



**CANYON FUEL COMPANY, LLC
Sufco Mine**

**South Fork Quitcupah 2R2S Block "A"
JULY 2012**



Canyon Fuel
Company, LLC.
Sufco Mine

A Subsidiary of Arch Western Bituminous Group, LLC.

C0410002
Incoming

Ken May, General Manager
597 South SR 24
Salina, UT 84654
(435) 286-4400 - Office
(435) 286-4499- Fax

#4155
OK

July 30, 2012

Permit Supervisor
Utah Coal Regulatory Program
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P. O. Box 145801
Salt Lake City, Utah 84114-5801

RECEIVED

AUG 06 2012

DIV. OF OIL, GAS & MINING

Re: South Fork Quitcupah 2R2S Block "A" Amendment, 2nd Submittal, to the Canyon Fuel Company, LLC, Sufco Mine, Permit Number C/041/0002

Dear Permit Supervisor:

Please find enclosed with this letter the Sufco Mine permit revision to modify the current Sufco monitoring and mitigation plan for undermining the South Fork of Quitcupah 2R2S Block "A" portion of the stream channel. We have included four copies of the modified text and plates in redline/strikethrough format along with completed C1 and C2 forms. Clean copies of the pages with modifications will be forwarded to the Division once the modification is approved for inclusion in the permit.

This resubmittal has been revised to clarify and address the deficiencies in the Division letter dated December 21, 2011 received on December 27, 2011. An interagency field tour of the area was conducted on June 6, 2012 by the Division of Oil, Gas and Mining, Forest Service, BLM, Division of Water Rights, Canyon Fuel Company and Consultants to review different monitoring and mitigation plan alternative actions.

The deficiencies and responses are:

1. **R645-301-552:** A similar protocol to that of the East Fork of Box canyon should also be adopted at the South Fork of Quitcupah Creek including filming the channel and the corresponding canyon rims. Documentation of the channel width, stream bed substrate, flow conditions and subsidence cracks along a series of monitoring locations. Monitoring criteria should include fixed vantage points that can easily be reproducible for subsequent monitoring event, collected width and depth measurement of any pools in the stream and height and depth of any cracks. Additional tools should also be used to observe subsidence cracks monitoring such as satellite imagery. In the case of east Fork of Box Canyon a post-subsidence monitoring report was due 90 days after subsidence was complete. Past experience has shown that access to the surface is limited to the summer months where access is available to monitor the stream bed surface and observed subsidence cracks As a

File in:

☐ Confidential
☒ Shelf
☐ Expandable

Date Folder 080612 C/0410002

See Confidential

result; the timing of the panel will have to be timed such that access to the surface is possible so that the effects from subsidence can be evaluated. (AA)

Response:

Item #1 was addressed by modifying the permit text pages and creating a new Mining and Mitigation Plan for Undermining the South Fork Quitcupah 2R2S Block A that has been added to the MRP as Appendix 3-14. The mine appreciates the Divisions concern on the timing of the panel during summer months for better access for monitoring but the timing of mining panels cannot be changed or stopped in the middle of a longwall panel for winter months.

2. **R645-301.724.100:** There is no groundwater monitoring wells in the canyon where the South Fork of Quitcupah Creek flows. As a result, baseline data from the nearest perched aquifers (if any) closest to the surface is absent. A groundwater well in the vicinity of the stream channel is essential for characterizing baseline groundwater conditions. The additional well in the stream channel will also be instrumental in measuring any losses of perennial flow from the stream that could migrate from fractures in the surface to any groundwater system below. A rise in the groundwater water table will provide important data to help better mitigate effects from loss of surface flow. Furthermore, based on the orientation of the proposed 2R2 panel and the panel adjacent south, it appears that groundwater monitoring well US-81-4 will be destroyed eventually by Longwall mining. Please advise the Division if there is a plan to eliminate this well via mining and provide a proposed location for a replacement well. (AA)

Response:

Studies have shown from other well data that the groundwater system is not significantly impacted (PHC Report) and that an additional well in the stream channel would not provide any more useful data than well US-81-4 which is in the adjacent 1R2S panel. If well US-81-4 is eliminated via mining, it will be removed from Table 7-2 water monitoring program in the MRP, as previous wells that have been mined through.

3. **R645-301-724.100:** Geologic resources, baseline and operational data should be included in the Probable Hydrologic Consequences (PHC) report prepared for the South Fork of Quitcupah Creek along with discharge and solute composition of the surface and groundwater properties of all hydrologic resources in the area. Currently, a lack of baseline data from springs, seeps, stock watering ponds and groundwater monitoring wells exists in the area. The locations of the water rights from springs, point to point diversions and stock watering ponds identified on the adjudication map provided by the Division of Water Rights (DWRi) required field verification with other interested stakeholders such as the US Forest Service, DWRi, the Division and mine personnel. A consensus should be reached among all stakeholders which groundwater resources and ponds should be targeted for an active baseline water monitoring program. An interagency field reconnaissance will need to be scheduled in the summer of 2012 to identify critical groundwater and stock water resources in the area. (AA)

Response:

An interagency field tour of the area was conducted on June 6, 2012 by the Division of Oil, Gas and Mining, Forest Service, BLM, Division of Water Rights, Canyon Fuel Company and Consultants to review different monitoring and mitigation plan alternative actions. Item #3 was addressed by creating a new Probable Hydrologic Consequences (PHC) for Undermining the South Fork Quitchupah 2R2S Block A that has been added to the MRP as Appendix 7-26.

4. **R645-301-728.100:** A PHC needs to be developed by the operator for the proposed Longwall mining below the South Fork of Quitchupah Creek. Similar to the PHC for the 3 left modification of the panel found Appendix 7-19 of the Sufco Mining and Reclamation Plan, full characterization of groundwater and surface water system for the South Fork of Quitchupah Creek needs to be developed prior to the undermining of the South Fork of Quitchupah Creek via Longwall mining. The PHC will outline the risks of significant disruption to the hydrologic balance to the hydrologic resources within the area of the South Fork of Quitchupah as well as any nearby springs seeps and stock watering ponds found in the area. (AA)

Response:

Item #4 was addressed by creating a new Probable Hydrologic Consequences (PHC) for Undermining the South Fork Quitchupah 2R2S Block A that has been added to the MRP as Appendix 7-26.

5. **R645-301.731.224.1:** Quarterly laboratory analytical data will be collected on the stream samples Sufco 006, as defined in the water monitoring protocol of the MRP on page 7-41. However, additional surface and/or groundwater samples should be collected for total iron if a visible iron precipitate is noted within the stream channel or originating from the springs and seeps. (AA)

Response:

Item #5 was addressed in the new Mining and Mitigation Plan for Undermining the South Fork Quitchupah 2R2S Block A that has been added to the MRP as Appendix 3-14. The mine believes the plans contained within this document will adequately address collecting samples for total iron if a visible iron precipitate is noted within the stream channel or originating from the springs and seeps.

6. **R645-301.731.530:** It is in the best interest of the mine operator, as well as the regulatory management agencies involved to have a well-defined water replacement contingency plan in place prior to the onset of mining under the S. Fork of Quitchupah Creek. Comment letters received from DWRi declared that all surface and groundwater within the drainage that supplies Quitchupah Creek is considered State-appropriated and will be required to satisfy downstream water rights. The USFS expressed concerns over the statements made regarding if the mine is unsuccessful in restoring flow after two spring runoff periods and that Canyon Fuel Company will initiate "additional planning and analysis with the Forest Service". The USFS position is that a solid mitigation plan should be hashed out prior to any water loss riparian habitat loss. (AA)

Response:

Item #6 was addressed by creating a new Mining and Mitigation Plan for Undermining the South Fork Quitcupah 2R2S Block A that has been added to the MRP as Appendix 3-14. The mine believes the plans contained within this document will adequately address restoring any loss of surface flows due to mining activities.

7. **R645-300-113 and R645-301-333:** The Fish and Wildlife Service should be consulted on the undermining of the South Fork of the Quitcupah. The permittee should address the requirements of the Fish and Wildlife Service's Colorado Fish Recovery Program. (IC)

Response:

Section 7 Consultation for the four endangered fish species in the Colorado River watershed has been completed between the Fish Lake National Forest and the Fish and Wildlife Service. The mine is located in a watershed that contributes to the Dirty Devil River that is not considered habitat for the endangered fish species, (Colorado Pike minnow, Humpback chub, Razorback and Bonytail chub). The FWS concurred with the Forest Services' determination of no affect through "E" mail correspondence. The correspondence from both agencies was provided to DOGM.

8. **R645-601-321:** Please provide a monitoring plan for the riparian vegetation along the South Fork of Quitcupah Creek that could be impacted from mining through loss of water or subsidence cracks. (IC)

Response:

Item #8 was addressed by creating a new Mining and Mitigation Plan for Undermining the South Fork Quitcupah 2R2S Block A that has been added to the MRP as Appendix 3-14. The new plan addresses a monitoring plan for riparian vegetation in the South Fork of Quitcupah.

9. **R645-301-322.210:** Please provide an updated list and investigation of effect of mining on listed or proposed endangered or threatened species of plant or animals or their critical habitats listed by the Secretary under Endangered Species Act of 1973 and species or habitats protected by similar state statutes. (IC)

Response:

Item #9 was addressed by updating Table 3-1 (page 3-15) and Table 3-2 (page 3-23) in Chapter 3 of the MRP.

10. **R645-301-322.220, -333, -358, and 585.400:** Please provide a commitment to provide alternate sources of water for wildlife via : development of springs, wells or guzzlers at strategic locations", as suggested by the Smith and Pritchett Report in Appendix 3-3 ad Page 3-40 of the MRP, in the case that water is lost due to undermining the South Fork of Quitcupah Creek. This commitment would have to be implemented immediately upon discovery of water loss, which may be prior to long term plans of water restoration development approval. (IC)

Response:

Item #10 was addressed by creating a new Mining and Mitigation Plan for Undermining the South Fork Quitchupah 2R2S Block A that has been added to the MRP as Appendix 3-14. This new plan clearly states how water will be made available for wildlife if there is a loss of surface flows.

11. **R645-301-322:** Please provide a monitoring plan for aquatic wildlife prior to undermining to access potential degradation impacts as suggested in the Smith and Pritchett Report Appendix 3-3 page 45. (IC)

Response:

Item #11 was addressed by creating a new Mining and Mitigation Plan for Undermining the South Fork Quitchupah 2R2S Block A that has been added to the MRP as Appendix 3-14. The new plan addresses a monitoring plan for aquatic wildlife in the South Fork of Quitchupah.

12. **R645-301-358:** Annual raptor surveys must be conducted over areas that mining could disturb nests or nesting raptors including subsidence areas and surface disturbance areas. The survey conducted in 2011 does not include areas over projected mine panels. The 2012 annual raptor survey must include areas over projected panels for the 2012 mining year. (IC)

Response:

Item #12 was addressed by including a copy of the current 2011 and 2012 raptor surveys in appendix 3-4 to go in the Confidential MRP Binder. The 2011 raptor survey did include areas over the projected mine panels and was included in the Sufco 2011 Division Annual Report. The 2012 annual raptor survey also included the areas over the projected panels for the 2012 mining year.

13. **R654-301-411:** A monitoring and mitigation plan must be developed for the protection of site 42SV3464 as suggested by the canyon Environmental report No. 110122. The plan must be developed prior to undermining the South Fork Quitchupah Creek and prepared in consultation with the US Forest Service, the Division and the State Historic Preservation Office. The MOU in appendix 4-5 does not currently include this site. (IC)

Response:

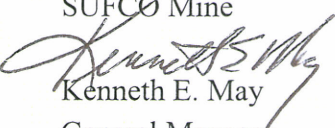
Item #13 will be addressed by creating a new Mining and Mitigation Plan Cultural Resource Memorandum of Agreement (MOA) with the U.S. Forest Service, Utah State Historic Preservation Office (USHPO), and Canyon Fuel Company, LLC for undermining the South Fork Quitchupah 2R2S Block A. This MOA will guide the mitigation of a small rock shelter (42SV3464) through excavation prior to undermining the shelter. This MOA will be added to the MRP as Appendix 4-6.

14. **R645-301.525.500:** On page 5-39E of the application, CFC states that if mitigation measures by Sufco personnel, and their consultants and contractors, are not successful in restoring flows after two spring runoff periods, Sufco will initiate additional analysis and planning with the Forest Service. In accordance with the Utah Coal Mining Rules as well as the requests from the US Forest Service, the applicant must include with this application a definite contingency plan for the event that mitigation measures are not successful. The Division and USFS seek to avoid a situation where the currently planned mitigation measures are unsuccessful and there is not a "backup" plan in place. (JO)

Response:

Item #14 was addressed in the new Mining and Mitigation Plan for Undermining the South Fork Quitchupah 2R2S Block A that has been added to the MRP as Appendix 3-14. The mine believes the plans contained within this document will adequately address restoring any loss of surface flows due to mining activities.

If you have any questions regarding the information contained in this letter or within the permit modification, please give Mike Davis a call at (435) 286-4421.

Sincerely,
CANYON FUEL COMPANY, LLC
SUFCO Mine

Kenneth E. May
General Manager

Encl.

cc: DOGM Correspondence File

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change ☒ New Permit ☐ Renewal ☐ Exploration ☐ Bond Release ☐ Transfer ☐

Permittee: CANYON FUEL COMPANY, LLC

Mine: SUFCO MINE

Permit Number:

C/041/0002

Title: Second Submittal - South Fork Quitchupah 2R2S Block "A"

Description, Include reason for application and timing required to implement:

Modification of the Monitoring & Mitigation plan for the South Fork Quitchupah 2R2S Block "A" portion of the stream channel.

Instructions: If you answer yes to any of the first eight questions, this application may require Public Notice publication.

- | | |
|---|---|
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 2. Is the application submitted as a result of a Division Order? DO# _____ |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 4. Does the application include operations in hydrologic basins other than as currently approved? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 6. Does the application require or include public notice publication? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 7. Does the application require or include ownership, control, right-of-entry, or compliance information? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 9. Is the application submitted as a result of a Violation? NOV # _____ |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 10. Is the application submitted as a result of other laws or regulations or policies? |

Explain: _____

- | | |
|---|--|
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 11. Does the application affect the surface landowner or change the post mining land use? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2) |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 13. Does the application require or include collection and reporting of any baseline information? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 15. Does the application require or include soil removal, storage or placement? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 16. Does the application require or include vegetation monitoring, removal or revegetation activities? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 17. Does the application require or include construction, modification, or removal of surface facilities? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 18. Does the application require or include water monitoring, sediment or drainage control measures? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 19. Does the application require or include certified designs, maps or calculation? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 20. Does the application require or include subsidence control or monitoring? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 21. Have reclamation costs for bonding been provided? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 23. Does the application affect permits issued by other agencies or permits issued to other entities? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 24. Does the application include confidential information and is it clearly marked and separated in the plan? |

Please attach three (3) review copies of the application. If the mine is on or adjacent to Forest Service land please submit four (4) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

KENNETH E. MAY

GENERAL MANAGER

8/1/12

Signature (Right-click above choose certify then have notary sign below)

Print Name

Position

Date

Subscribed and sworn to before me this 1 day of August, 2012

Notary Public: Jacquelyn Nebeker, state of Utah.

My commission Expires: _____

Commission Number: _____

Address: _____

City: _____

State: _____

Zip: _____

} ss: _____



JACQUELYN NEBEKER

Notary Public

State Of Utah

My Commission Expires 3/24/2015

Commission# 606049

For Office Use Only:

Assigned Tracking
Number:

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DIV. OF OIL, GAS & MINING

APPLICATION FOR COAL PERMIT PROCESSING

Detailed Schedule Of Changes to the Mining And Reclamation Plan

Permittee: CANYON FUEL COMPANY, LLC

Mine: SUFCO MINE

Title: Second Submittal - South Fork Quitcupah 2R2S Block "A"

Permit Number:

C/041/0002

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED

<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Pages 1-8 to 1-12 in Chapter 1, Volume 1 of MRP.
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Pages 3-iv, 3-15 to 3-17, 3-23 to 3-38 in Chapter 3, Volume 1 of MRP.
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Pages 4-ii, 4-12 to 4-12A in Chapter 4, Volume 1 of MRP.
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Pages 5-39C to 5-40 in Chapter 5, Volume 1 of MRP.
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Pages 7-iv, 7-vii, 7-41 to 7-43, 7-48, 7-51G to 7-51L in Chapter 7, Volume 2 of MRP.
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Add Lease relinquishment documents at the back of Appendix 1-2, Volume 4 of MRP.
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Add new 2R2S Block "A" Monitoring and Mitigation Plan in Appendix 3-14, Vol. 5 of MRP.
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Add new MOA in Appendix 4-6, Volume 6 of MRP.
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Add new PHC in Appendix 7-26, Volume 8 of MRP.
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Plates 5-6, 5-10A and 5-10C in Chapter 5, Volume 1 of MRP.
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Plates 7-2A and 7-3 in Chapter 7, Volume 2 of MRP.
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<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Sufco Mine Confidential MRP Binder
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	2011 and 2012 Raptor Surveys at the back of Appendix 3-4 in the Confidential MRP Binder.
<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	Cultural Resource Study at the back of Appendix 4-2 in the Confidential MRP Binder.
<input type="checkbox"/> Add	<input checked="" type="checkbox"/> Replace	<input type="checkbox"/> Remove	Plates 5-10AC and 5-10CC in Chapter 5, Confidential MRP Binder.
<input type="checkbox"/> Add	<input type="checkbox"/> Replace	<input type="checkbox"/> Remove	
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Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.

Received by Oil, Gas & Mining

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AUG 06 2012

DIV. OF OIL, GAS & MINING

CHAPTER 1
GENERAL CONTENTS

The legal description of the SUFCO coal leases:

Federal Coal Lease U-28297 - (~~2,631.98~~ 716.51 acres) - Approved January 1979
Modified January 2012

T. 21 S., R. 5 E., SLM, Utah
Sec. 32, lots 1-4, N1/2S1/2
Sec. 33, lot 1, NW1/4SW1/4
T. 22 S., R. 5 E., SLM, Utah
~~Sec. 4, lot 4, SW1/4NW1/4, W1/2SW1/4~~
Sec. 5, all W1/2W1/2;
Sec. 7, S1/2NE1/4, E1/2SW1/4, W1/2SE1/4;
Sec. 8, all W1/2NW1/4.
~~Sec. 17, NE1/4, N1/2NW1/4~~
~~Sec. 18, NE1/4, E1/2NW1/4~~

Federal Coal Lease U-062453 - (480 acres) - Approved March 1962

T. 21 S., R. 5 E., SLM, Utah
Sec. 28, SW1/4SW1/4
Sec. 29, SE1/4SE1/4
Sec. 32, N1/2
Sec. 33, W1/2NW1/4

Federal Coal Lease U-0149084 - (240 acres) - Approved June 1966

T. 22 S., R. 4 E., SLM, Utah
Sec. 12, NE1/4 and N1/2SE1/4

Federal Coal Lease SL-062583 - (3,079.83 acres) - Approved September 1941
Modified January 1973
Modified December 2009

T. 21 S., R. 4 E., SLM, Utah
Sec. 36, S1/2
T. 21 S., R. 5 E., SLM, Utah
Sec. 31, all;
T. 22 S., R. 4 E., SLM, Utah
Sec. 1, lots 1 to 4 incl. S1/2N1/2, S1/2
Sec. 2, SE1/4, S1/2SW1/4;
Sec. 3, SE1/4SE1/4;
Sec. 10, E1/2NE1/4, NE1/4SE1/4;
Sec. 11, N1/2, N1/2S1/2;
Sec. 12, NW1/4
T. 22 S., R. 5 E., SLM, Utah
Sec. 6, all;
Sec. 7, N1/2NE1/4, E1/2NW1/4

Federal Coal Lease U-47080 - (1,953.73 acres) - Approved October 1981
Modified December 2009

T. 21 S., R. 4 E., SLM, Utah

Sec. 25, all;
Sec. 35, E1/2, E1/2SW1/4;
Sec. 36, N1/2.
T. 21 S., R. 5 E., SLM, Utah
Sec. 30, lots 2-4, W1/2SE1/4
T. 22 S., R. 4 E., SLM, Utah
Sec. 2, lots 1-4, S1/2NE1/4, S1/2NW1/4, N1/2SW1/4;
Sec. 3, NE1/4SE1/4.

Federal Coal Lease U-63214 - (10,695.468,826.34 acres) - Approved July 1989
Modified June 1999
Modified December 2009
Modified May 2011

Tract 1:

T. 21 S., R. 4 E., SLM, Utah
Sec. 12, E1/2SE1/4
Sec. 13, E1/2NE1/4, S1/2
Sec. 14, E1/2SW1/4, SE1/4
Sec. 23, E1/2, E1/2W1/2
Sec. 24, all.
T. 21 S., R. 5 E., SLM, Utah
Sec. 15, W1/2
Secs. 16-21, all;
Sec. 22, W1/2
Sec. 26, W1/2NW1/4SW1/4, SW1/4SW1/4
Sec. 27, all;
Sec. 28, N1/2, N1/2SW1/4, SE1/4SW1/4, SE1/4
Sec. 29, E1/2NE1/4, NE1/4SE1/4
Sec. 30, lot 1, N1/2NE1/4
Sec. 33, lots 2-4, NE1/4, E1/2NW1/4, NE1/4SW1/4, N1/2SE1/4
Sec. 34, all, NW1/4NE1/4, NW1/4, NW1/4SW1/4.
~~Sec. 35, lots 1, 2, W1/2NW1/4, N1/2SW1/4.~~
~~T. 22 S., R. 5 E., SLB&M, Utah~~
~~Sec. 3, lots 1-4, S1/2N1/2, NE1/4SW1/4, S1/2SW1/4, N1/2SE1/4,~~
~~SW1/4SE1/4~~
~~Sec. 4, lots 1, 2, S1/2NE1/4, SE1/4SE1/4~~
~~Sec. 9, NE1/4NE1/4~~
~~Sec. 10, W1/2NE1/4, NW1/4, N1/2SW1/4.~~

Tract 2:

T. 21 S., R. 5 E., SLM, Utah
Sec. 10, SE1/4NW1/4, E1/2SW1/4, E1/2E1/2SW1/4SW1/4,
E1/2E1/2NW1/4SW1/4, E1/2E1/2SW1/4NW1/4.

Tract 3:

T. 21 S., R. 4 E., SLM, Utah
Sec. 26, E1/2, E1/2SW1/4;
Sec. 35, NW1/4, W1/2SW1/4.

Federal Coal Lease UTU-76195 - (5,694.66 acres) - Approved October 1999
Modified December 2006

- T. 21 S., R. 5 E., SLM
Sec. 2, lots 3,4, S1/2SW1/4, SW1/4SE1/4
Sec. 10, E1/2
Sec. 11, all
Sec. 12, S1/2SW1/4, NW1/4SW1/4
Sec. 13, NW1/4, S1/2
Sec. 14, all
Sec. 15, E1/2
Sec. 22, E1/2
Sec. 23-24, all
Sec. 25, N1/2, N1/2S1/2
Sec. 26, N1/2, NE1/4SW1/4, E1/2NW1/4SW1/4, SE1/4
T. 21 S., R. 6 E., SLM
Sec. 19, lots 3-4, E1/2SW1/4
Sec. 30, lots 1-3, E1/2NW1/4, NE1/4SW1/4

State of Utah Coal Lease ML 49443-OBA - (2,134.19 acres) - Approved October 2004

- T. 21 S., R. 5 E., SLB&M
Sec. 4: Lots 1, 2, 3, 4, S1/2S1/2
Sec. 5: Lots 1, 2, 3, 4, S1/2S1/2
Sec. 7: Lots 2, 3, 4, S1/2NE1/4, SE1/4
Sec. 8: All
Sec. 9: All

Canyon Fuel Company, LLC acquired the right to entry on these properties in the merger described in Section 111 hereinabove.

In addition, the SUFCO Mine permit area includes certain fee lands owned by Canyon Fuel Company, LLC as follows:

- T. 21 S., R. 5 E., SLB&M, Utah
Sec. 29, SW1/4, NW1/4, W1/2NE1/4, W1/2SE1/4
Sec. 30, S1/2NE1/4, E1/2SE1/4
containing 640.00 acres
T. 22 S., R. 4 E., SLB&M, Utah
Sec. 18, NW1/4NE1/4
containing 40 acres

The name of the owner of these fee lands changed from Coastal States Energy Company to Canyon Fuel Company, LLC as a result of the merger transaction described in Section 111 hereinabove.

The SUFCO Mine also uses certain Forest Service lands in its operation for a spring collection system, pumphouse, water transmission line, sanitary discharge line, sanitary drainfield, access

road to the sediment pond, and 25 KV powerline. These USFS special use permit areas are shown on Plate 5-6 through portions of:

T. 22 S., R. 4 E., SLB&M, Utah
Sec. 12, S1/2
containing 15.32 acres

The name of the permittee changed from Southern Utah Fuel Company to Canyon Fuel Company, LLC pursuant to the merger described in Section 111 herein above.

The total lease area includes ~~24,775.66~~20,991.07 acres of Federal coal leases, 2,134.19 acres of State of Utah coal leases, 640 acres of fee coal leases, the 40 acres waste rock disposal site and 15.32 acres under U.S. Forest Service special use permit for a total of ~~27,605.17~~23,820.58 acres.

115 Status of Unsuitability Claims

To the best knowledge of Canyon Fuel Company, LLC, no portion of the area to be permitted is designated, or under study for being designated, unsuitable for mining.

Since the SUFCO Mine was in production before passage of the Surface Mining Control and Reclamation Act of 1977, the unsuitability criteria were not applied to the existing surface facilities.

Canyon Fuel Company, LLC does not propose to conduct coal mining or reclamation operations within 300 feet of any occupied dwelling. Coal mining and reclamation operations have been or will be conducted within 100 feet of a public road, see Section 5.2.1.1 for details. Forest Service approval to conduct coal mining and reclamation operations within 100 feet of the Link Canyon forest service road is located in Appendix 1-1 and the newspaper advertisement for public comment is located in Appendix 1-3.

116 Permit Term

The following information is presented to identify permit term requirements and stipulations. Canyon Fuel Company will be operating the SUFCO Mine with continuous miner and longwall

mining methods. Although the Mining and Reclamation Permit Application covers the next five-year period of mining, information is presented below for the life of the mining operation.

1.	First coal produced	1941
2.	Termination of mining activity	December, 2016 August, 2025
3.	Horizontal extent of mine workings	27,605.17 23,820.58 acres (Life of mine)
4.	Vertical extent of mine workings	Surface to 2,000 feet deep (Life of mine)

The anticipated total acreage to be affected during the five years of operation by underground mining activities is 1,500 acres. The estimated number of total surface acres to be affected over the entire mining operation is 48.432 acres.

<u>PERMITTED DISTURBED AREA BOUNDARY</u>	<u>ACTUAL AREA CURRENTLY DISTURBED TO BE RECLAIMED</u>	<u>SITE DESCRIPTION</u>
30.210	17.405	Mine Site, East Spring Canyon
0.967	0.39	Spring Collection Field, Convulsion Canyon
0.220	0.075	Pump House, Convulsion Canyon
0.784	0.40	Leach Field, Convulsion Canyon
1.595	0.193	Water Tank, East Spring Canyon
0.286	0.017	3 East Portals
1.774	0.70	4 East Portals
0.302	0.017	South Portals
0.396	0.017	Quitcupah Portals
0.287	0.18	Link Canyon Substation No. 1
0.245	0.12	Link Canyon Substation No. 2
0.380	0.18	Link Canyon Portal
10.986	8.733	Waste Rock Disposal Site
0.000	0.00	North Water Mitigation Area
0.000	0.00	Quitcupah Fan and Shaft Site
48.432	28.427	Totals

The legal description of the SUFCA permit area:

Mine Site Facility, Water Tank, South Portals, Spring Collection Field, Pump House, Pipeline, Leachfield (Approximately 64.403 acres)

T. 22 S., R. 4 E., SLBM, Utah

Section 12: A Portion of the following:

E1/2NW1/4, SW1/4NW1/4NE1/4, S1/2

CHAPTER 3
BIOLOGY

LIST OF PLATES

Plate

- 3-1 Plant Communities and Reference Areas
- 3-2 Elk Range
- 3-3 Deer Range & Raptor Nests

LIST OF APPENDICES

(Appendices appear in Volume 5)

Appendix

- 3-1 Report of 1983 Field Investigations
- 3-2 Aquatic Resource Inventory of Southern Utah Fuel Company Permit Area
- 3-3 Wildlife Assessment of the Southern Utah Fuel Company Mining Property and Adjacent Areas
- 3-4 Raptor and General Avifauna Studies
- 3-5 Fauna of Southeastern Utah and Life Requisites Regarding their Ecosystems
- 3-6 Vegetation Information Guidelines, Appendix A
- 3-7 Power Line Correspondence
- 3-8 Bat Survey for the SUFCO Mine
- 3-9 Vegetation and Wildlife of the Pines Tract Project.
- 3-10 Monitoring and Mitigation Plan for Mining Under the East Fork of Box Canyon
- 3-11 Muddy Creek Technical Report-Wildlife
- 3-12 Mexican Spotted Owl Survey Muddy Tract
- 3-13 Vegetation and Wildlife of the West Coal Lease Modifications
- 3-14 Monitoring and Mitigation Plan for Undermining the South Fork of Quitcupah 2R2S Block "A"

Table 3-1

Federally Listed and Proposed Endangered Species in Utah
Sevier and Emery Counties
January 2005 (Revised) March 29, 2011

<u>Plants</u>		Status
Barneby Reed-Mustard	<u>Schoenocrambe barnebyi</u>	E
Heliotrope Milk-Vetch	<u>Astragalus montii</u>	T
Jones Cycladenia	<u>Cycladenis humilis var. jonesii</u>	T
Last Chance Townsendia	<u>Townsendia aprica</u>	T
Maguire Daisy	<u>Erigeron maguirei</u>	T
San Rafael Cactus	<u>Pediocactus despainii</u>	E
Wright Fishhook Cactus	<u>Sclerocactus wrightiae</u>	E
Winkler Cactus	<u>Pediocactus winkleri</u>	T
<u>Mammals</u>		
Black-Footed Ferret	<u>Mustela nigripes</u>	E-Extirpated
Utah Prairie Dog	<u>Cynomys parvidens</u>	T

Brown (Grizzly) Bear	<u>Ursus arctos</u>	T-Extirpated
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Canada Lynx	<u>Lynx canadensis</u>	T
-------------	------------------------	---

Gray Wolf	<u>Canis lupus</u>	E
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Birds

Bald Eagle	<u>Haliaeetus leucocephalus</u>	T
------------	---------------------------------	---

Mexican Spotted Owl	<u>Strix occidentalis lucida</u>	T
---------------------	----------------------------------	---

Southwestern Willow Flycatcher	<u>Empidonax traillii extimus</u>	E
--------------------------------	-----------------------------------	---

Greater Sage-grouse	<u>Centrocercus urophasianus</u>	C
---------------------	----------------------------------	---

Yellow-billed Cuckoo	<u>Coccyzus americanus</u>	C
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Fish

Bonytail Chub	<u>Gila elegans</u>	E
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Colorado Pikeminnow	<u>Ptychocheilus lucius</u>	E
---------------------	-----------------------------	---

Humpback Chub	<u>Gila cypha</u>	E
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Razorback Sucker	<u>Xyrauchen texanus</u>	E
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Reptiles

None listed in the Sevier and Emery Counties

Snails

None listed in the Sevier and Emery Counties

E - Endangered T - Threatened **Extirpated - No longer occur in Utah** **C - Candidate**

For additional information contact: U. S. Fish and Wildlife Service, 2078 Administration Building,
1745 West 1700 South, Salt Lake City, Utah 84204-5110

Telephone: Commercial (801) ~~524-5001~~ **975-330**

Table 3-2

Native Utah Wildlife Species of Special Interest

Sevier and Emery Counties

January 2005 (Revised) March 29, 2011

<u>Mammals</u>		State Status
Brown (Grizzly) Bear	<u>Ursus arctos</u> ^{2,4}	EX S-ESA
Fisher	<u>Martes pennanti</u>	EX
Gray Wolf	<u>Canis lupus</u> ¹	EX S-ESA
Black-footed Ferret	<u>Mustela nigripes</u> ^{1,4}	EN S-ESA
Utah Prairie Dog	<u>Cynomys parvidens</u> ²	T
Wolverine	<u>Gulo gulo</u>	T
Spotted Bat	<u>Euderma maculatum</u>	SP
Allen's Big-eared Bat	<u>Idionycteris phyllotis</u>	SD
Fringed Myotis	<u>Myotis thysanodes</u>	SD SPC
Dwarf Shrew	<u>Sorex nanus</u>	SD
Desert Shrew	<u>Notiosorex crawfordi</u>	SD

Abert's Squirrel	<u>Sciurus aberti navajo</u>	SD
Belding ground Squirrel	<u>Spermophilus beldingi</u>	SD
Thirteen-lined Ground Squirrel	<u>Spermophilus tridecemlineatus</u>	SD
Spotted Ground Squirrel	<u>Spermophilus spilosoma</u>	SD
Wyoming Ground Squirrel	<u>Spermophilus elegans</u>	SD
Yellow Pine Chipmunk	<u>Tamias amoenus</u>	SD
Rock Pocket Mouse	<u>Chaetodipus intermedius</u>	SD
Olive-backed Pocket Mouse	<u>Perognathus fasciatus</u>	SD
Merriam's Kangaroo Rat	<u>Dipodomys merriami</u>	SD
Chisel-toothed Kangaroo Rat	<u>Dipodomys microps celsus</u>	SD
Cactus Mouse	<u>Peromyscus eremicus</u>	SD
Southern Grasshopper Mouse	<u>Onychomys torridus</u>	SD
Marten	<u>Martes americana</u>	SD
Pika	<u>Ochotona princeps</u>	SD
Ringtail	<u>Bassariscus astutus</u>	SD
Northern Flying Squirrel	<u>Glaucomys sabrinus</u>	SD

Western Red Bat	<u>Lasiurus blossevillii</u>	SP/SD
Big Free-tailed Bat	<u>Nyctinomops macrotis</u>	SP/SDSPC
Brazilian Free-tailed Bat	<u>Tadarida brasiliensis mexicana</u>	SP/SD
Townsend's Big-eared Bat	<u>Plecotus townsendii</u>	SP/SDSPC
Desert Kangaroo Rat	<u>Dipodomys deserti</u>	SP/SD
Northern Rock Mouse	<u>Peromyscus nasutus</u>	SP/SD
Stephen's Woodrat	<u>Neotoma stephensi</u>	SP/SD
Virgin River Montane Vole	<u>Microtus montanus rivularis</u>	SP/SD
Mexican Vole	<u>Microtus mexicanus</u>	SP/SD
Northern River Otter	<u>Lutra canadensis</u>	SP/SD
North American Lynx	<u>Felis lynx canadensis</u>	SP/SD
Canada Lynx	Lynx canadensis ²	FS-ESA
Kit Fox	<u>Vulpes macrotis</u>	SPC
White-tailed Prairie-dog	<u>Cynomys leucurus</u>	SPC
Pygmy Rabbit	<u>Brachylagus idahoensis</u>	SPC

Birds

Passenger Pigeon	<u>Ectopistes migratorius</u>	E
Southwestern Willow Flycatcher	<u>Empidonax traillii extimus</u> ¹	EN S -ESA
Bald Eagle	<u>Haliaeetus leucocephalus</u>	† S PC
Ferruginous Hawk	<u>Buteo regalis</u>	† S PC
Yellow-billed Cuckoo	<u>Coccyzus americanus occidentalis</u> ³	† S -ESA
Spotted (Mexican) Owl	<u>Strix occidentalis lucida</u> ²	† S -ESA
Northern Goshawk	<u>Accipiter gentilis</u>	SP C S
Swainson's Hawk	<u>Buteo swainsoni</u>	SP
Caspian Tern	<u>Sterna caspia</u>	SP
Black Tern	<u>Chlidonias niger</u>	SP
Burrowing Owl	<u>Athene cunicularia</u>	SP C
Common Yellowthroat	<u>Geothlypis trichas</u>	SP
Short-eared Owl	<u>Asio flammeus</u>	SP C
American White Pelican	<u>Pelecanus erythrorhynchos</u>	SD S PC
California Condor	<u>Gymnogyps californianus</u>	SD
Osprey	<u>Pandion haliaetus</u>	SD

Sharp-tailed Grouse	<u>Tympanuchus phasianellus columbianus</u>	SD
Williamson's Sapsucker	<u>Sphyrapicus thyroideus</u>	SD
Three-toed Woodpecker	<u>Picoides tridactylus</u>	SDSPC
Greater Sage-Grouse	<u>Centrocercus urophasianus</u> ³	SP/SDS-ESA
Mountain Plover	<u>Charadrius montanus</u> ³	SP/SD
Long-billed Curlew	<u>Numenius americanus</u>	SP/SDSPC
Black Swift	<u>Cypseloides niger</u>	SP/SDSPC
Lewis's Woodpecker	<u>Melanerpes lewis</u>	SP/SDSPC
Crissal Thrasher	<u>Toxostoma crissale</u>	SP/SD
Bell's Vireo	<u>Vireo bellii</u>	SP/SD
Blue Grosbeak	<u>Guiraca caerulea</u>	SP/SD
Grasshopper Sparrow	<u>Ammodramus savannarum</u>	SP/SD
Bobolink	<u>Dolichonyx oryzivorus</u>	SP/SD
<u>Fish</u>		
Utah Lake Sculpin	<u>Cottus echinatus</u>	E
Bonytail	<u>Gila elegans</u> ¹	ENS-ESA

Colorado Squawfish	<u>Ptychocheilus lucius</u> ⁴	EN
Humpback Chub	<u>Gila cypha</u> ¹	ENS-ESA
Razorback Sucker	<u>Xyrauchen texanus</u> ¹	ENS-ESA
Woundfin	<u>Plagopterus argentissimus</u> ⁴	EN
Virgin River Chub	<u>Gila seminuda</u> ⁴	EN
June Sucker	<u>Chasmistes liorus</u> ⁴	EN
Lahontan Cutthroat Trout	<u>Oncorhynchus clarki henshawi</u> ²	T
Roundtail Chub	<u>Gila robusta</u>	TCS
Leatherside Chub	<u>Gila copei</u>	SP
Flannelmouth Sucker	<u>Catostomus latipinnis</u>	SPCS
Bluehead Sucker	<u>Catostomus discobolus</u>	SPCS
Bonneville Cisco	<u>Prosopium gemmiferum</u>	SD
Bonneville Whitefish	<u>Prosopium spilonotus</u>	SD
Bear Lake Whitefish	<u>Prosopium abyssicola</u>	SD
Bear Lake Sculpin	<u>Cottus extensus</u>	SD
Desert Sucker	<u>Catostomus clarki</u>	SD

Colorado River Cutthroat Trout	<u>Oncorhynchus clarki pleuriticus</u>	€CS
Bonneville Cutthroat Trout	<u>Oncorhynchus clarki utah</u>	€CS
Virgin Spinedace	<u>Lepidomeda mollispinis mollispinis</u>	G
Least Chub	<u>Lotichthys phlegethontis</u>³	G
Colorado Pikeminnow	<u>Ptychocheilus lucius</u> ¹	S-ESA
Southern Leatherside Chub	<u>Lepicomeda aliciae</u>	SPC

Reptiles and Amphibians

Relict Leopard Frog	<u>Rana onca</u>	E
Banded Gila Monster	<u>Heloderma suspectus cinctum</u>	EN
Desert Tortoise	<u>Gopherus agassizii</u> ²	EN
Arizona Toad	<u>Bufo microscaphus microscaphus</u>	SP
Western (Boreal) Toad	<u>Bufo boreas boreas</u> ³	SPC
Lowland Leopard Frog	<u>Rana yavapaiensis</u>	SP
Utah Mountain Kingsnake	<u>Lampropeltis pyromelana infralabialis</u>	SP
Utah Milk Snake	<u>Lampropeltis triangulum taylori</u>	SP

Desert Iguana	<u>Dipsosaurus dorsalis</u>	SD
Utah Banded Gecko	<u>Coleonyx variegatus utahensis</u>	SD
Utah Night Lizard	<u>Xantusia vigilis utahensis</u>	SD
Desert Night Lizard	<u>Xantusia vigilis vigilis</u>	SD
Mojave Zebra-tailed Lizard	<u>Callisaurus draconoides rhodostictus</u>	SD
Pacific Chorus Frog	<u>Pseudacris regilla</u>	SD
California Kingsnake	<u>Lampropeltis getula californiae</u>	SD
Southwestern Black-headed Snake	<u>Tantilla hobartsmithi</u>	SD
Desert Glossy Snake	<u>Arizona elegans eburnata</u>	SD
Painted Desert Glossy Snake	<u>Arizona elegans philipi</u>	SD
Sonora Lyre Snake	<u>Trimorodon biscutatus lambda</u>	SD
Utah Blind Snake	<u>Leptotyphlops humilis utahensis</u>	SD
Mojave Patch-nosed Snake	<u>Salvadora hexalepis mojavenis</u>	SD
Southwestern Speckled Rattlesnake	<u>Crotalus mitchellii pyrrhus</u>	SD
Mojave Rattlesnake	<u>Crotalus scutulatus scutulatus</u>	SD
Mojave Desert Sidewinder	<u>Crotalus cerastes cerastes</u>	SD

Western Chuckwalla	<u>Sauromalus obesus obesus</u>	SP/SD
Glen Canyon Chuckwalla	<u>Sauromalus obesus multiforaminatus</u>	SP/SD
Many-lined Skink	<u>Eumeces multivirgatus gaigeae</u>	SP/SD
Plateau Striped Whiptail	<u>Cnemidophorus velox</u>	SP/SD
Great Plains Rat Snake	<u>Elaphe guttata emoryi</u>	SP/SD
Smooth Green Snake	<u>Opheodrys vernalis</u>	SP/SD
Spotted Frog	<u>Rana pretiosa</u> ³	G
Cornsnake	<u>Elaphe guttata</u>	SPC
Great Plains Toad	<u>Bufo cognatus</u>	SPC

MOLLUSK

Kanab Ambersnail	<u>Oxyloma haydeni kanabensis</u> ⁴	E
Fish Springs Pond Snail	<u>Stagnicola pilsbryi</u>	E
Utah Valvatasnail	<u>Valvata utahensis</u> ⁴	E
California Floater	<u>Anodonta californiensis</u>	T
Thickshell Pondsnaill		
[Utah Band Snail]	<u>Stagnicola utahensis</u>	T

Round Mouth Valvata	<u>Valvata humeralis</u>	SP
Clinton Cave Snail	<u>Pristiloma subrupicola</u>	SD
Eureka Mountainsnail	<u>Oreohelix eurekaensis eurekaensis</u>	SD
Lyrate Mountainsnail	<u>Oreohelix haydeni haydeni</u>	SD
Ogden Rocky Mountainsnail	<u>Oreohelix peripherica wasatchensis</u> ^a	SD
Wet-rock Physa		
[Zion Canyon Snail]	<u>Physella zionis</u>	SD
Yavapai Mountainsnail	<u>Oreohelix yavapai</u>	SD
Brian Head Mountainsnail	<u>Oreohelix parowanensis</u>	SP/SD
Fat-whorled Pondsnaill	<u>Stagnicola bonnevillensis</u> ^a	SP/SD
Utah Physa		
[Utah Bubble Snail]	<u>Physella utahensis</u>	SP/SD
Uinta Mountainsnail	<u>Oreohelix eurekaensis uinta</u>	SP/SD
Desert Spring Snail	<u>Pyrgulopsis deserta</u>	SP/SD
Fish Lake Physa Snail	<u>Physella microstriata</u>	SP/SD
Carinate Glenwood Pyrg	<u>Pyrgulopsis inopinata</u>	SPC
Otter Creek Pyrg	<u>Pyrgulopsis fusca</u>	SPC

Smooth Glenwood Pyrg

Pyrgulopsis chamberlini

SPC

None of these species are located in the mine lease area.

¹Species is federally listed as Endangered

²Species is federally listed as Threatened

³Species is federally listed as Candidate

⁴Species is federally listed as Extirpated

Key to State Status Field

Symbol

Definition

S-ESA

Federally-listed or candidate species under the Endangered Species Act.

SPC

Wildlife species of concern.

CS

Species receiving special management under a Conservation Agreement in order to preclude the need for Federal listing.

~~E - Extinct: Any wildlife species that has disappeared in the world.~~

~~EX - Extirpated: Any wildlife species that has disappeared from Utah since 1800.~~

~~EN - Endangered: Any wildlife species or subspecies which is threatened with extirpation from Utah or extinction resulting from very low or declining numbers, alteration and/or reduction of habitat, detrimental environmental changes, or any combination of the above. Continued long-term survival is unlikely without implementation of special measures.~~

- ~~T - Threatened: Any wildlife species or subspecies which is likely to an endangered species within the foreseeable future throughout all or a significant part of its range in Utah or the world.~~
- ~~SP - Special Concern: Any wildlife species or subspecies which has experienced a substantial decrease in population, distribution and/or habitat availability.~~
- ~~SD - Special Concern: Any wildlife species or subspecies which occurs in limited areas and/or numbers due to a restricted or specialized habitat.~~
- ~~SP/SD - Special Concern: Any wildlife species or subspecies which has both a declining population and a limited range.~~
- ~~C - Conservation: Any wildlife species or subspecies, except those species currently listed under the Endangered Species Act as Threatened or Endangered, that meets the state criteria of Endangered, Threatened or of Special Concern, but is currently receiving sufficient special management under a Conservation Agreement developed and/or implemented by the state to preclude its listing above. In the event that the conservation agreement is not implemented, the species will be elevated to appropriate category.~~

Utah Division of Wildlife Resources, 1596 West North Temple, Salt Lake City, Utah 84116-3195

Table 3-3

USDA-FS Region 4 Sensitive Species

Fishlake and Manti-LaSal

~~January 1999~~ July 27, 2011 update

<u>Plants</u>		Status
Link Canyon Trail Columbine	<u>Aquilegia flavescens var. rubicunda</u>	S
Cruetzfeldt-flower Cryptanth	<u>Cryptantha creutzfeldii</u>	S
Carrington Daisy	<u>Erigeron carringtoniae</u>	S
Canyon Sweetvetch	<u>Hedysarum occidentale var. canone</u>	S
Maguire Campion	<u>Silene petersonii</u>	S
Musinea Groundsel	<u>Senecio musinensis</u>	S
Arizona Willow	<u>Salix arizonica</u>	S
Wonderland Alice Flower	<u>Aliciella caespitosa</u>	S
Chatterley Onion	<u>Allium geyeri var. chatterleyi</u>	S
Sweet-flower Rock Jasmine	<u>Androsace chamaejasme ssp. Carinata</u>	S
Bicknell milkvetch	<u>Astragalus consobrinus</u>	S

Isely's Milkvetch	<u>Astragalus iselyi</u>	S
Tushar Paintbrush	<u>Castilleja parvula var. parvula</u>	S
Pinnate Spring-parsley	<u>Cymopterus beckii</u>	S
Abajo Peak Draba	<u>Draba abajoensis</u>	S
Mt. Belknap Draba	<u>Draba ramulosa</u>	S
Creeping Draba	<u>Draba sobolifera</u>	S
Nevada Willowherb	<u>Epilobium nevadense</u>	S
Abajo Daisy	<u>Erigeron abajoensis</u>	S
Kachina Daisy	<u>Erigeron kachinensis</u>	S
Maquire Daisy	<u>Erigeron maguirei</u>	S
LaSal Daisy	<u>Erigeron mancus</u>	S
Elsinore Buckwheat	<u>Eriogonum batemanii var. ostlundii</u>	S
Canyonlands Lomatium	<u>Lomatium latilobum</u>	S
Fish Lake Naiad	<u>Najas caespitosa</u>	S
Beaver Mountain Groundsel	<u>Packera castoreus</u>	S
Little Penstemon	<u>Penstemon parvus</u>	S

Ward Beardtongue	<u>Penstemon wardii</u>	S
Bicknell Thelesperma	<u>Thelesperma subnudum var. alpinum</u>	S
Barneby Woody Aster	<u>Tonestus kingii var. barnebyana</u>	S
Sevier Townsendia	<u>Townsendia jonesii var. lutea</u>	S

Mammals

Townsend's Western Big-eared Bat	<u>Corynothinus townsedii townsendii</u>	S
Spotted Bat	<u>Euderma maculatum</u>	S
Bighorn Sheep	<u>Ovis canadensis</u>	S
Pygmy Rabbit	<u>Brachylagus idahoensis</u>	S

Birds

Northern Goshawk	<u>Accipiter gentilis</u>	S
Flammulated Owl	<u>Otus flammeolus</u>	S
Northern Three-toed Woodpecker	<u>Picoides tridactylus</u>	S
Bald Eagle	<u>Haliaeetus leucocephalus</u>	S
Greater Sage-grouse	<u>Centrocercus urophasianus</u>	S

Peregrine Falcon	<u>Falco peregrinus anatum</u>	S
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Yellow-billed Cuckoo	<u>Coccyzus americanus</u>	S
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Fish

Colorado River Cutthroat Trout	<u>Oncorhynchus clarki pleuriticus</u>	S
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Bonneville Cutthroat Trout	<u>Oncorhynchus clarki utah</u>	S
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Southern Leatherside Chub	<u>Lepidomeda aliciae</u>	S
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Amphibians

Spotted Frog	<u>Rana pretiosa</u>	S
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Boreal Toad	<u>Bufo boreas</u>	S
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S - Sensitive: Any species which, although still occurring in numbers adequate for survival, has been greatly depleted or occurring in limited areas and/or numbers due to a restricted or specialized habitat.

USDA-Manti-LaSal National Forest, 599 Price River Dr., Price , Utah 84501

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LAND USE AND AIR QUALITY

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The Applicant agrees, however, to notify the regulatory authority and the Utah State Historical Preservation Office (SHPO) of previously unidentified cultural resources discovered in the course of mining operations. The Applicant also agrees to have any such cultural resources evaluated in terms of National Register of Historic Places eligibility criteria.

West Coal Lease Modification Areas

Cultural and Historic Information. Cultural resource information and maps identifying cultural and historical study areas are located in Appendix 4-2 in the Confidential folder of the M&RP. EarthTouch, Inc. conducted an intensive evaluation of the West Coal Lease Modification Areas.

The results of the cultural resource inventory for the project resulted in the identification of 15 cultural resource sites, which included three previously recorded sites (42SV1301, 42SV1386 and 42SV2688), and 12 new sites (42SV3207-3215 and 42SV3246-3248). Overall, the identified cultural resource sites consist of small- to moderate-sized lithic scatters and small rock shelters/overhangs, some with associated pictographs. Of the 15 sites identified within the West Coal Lease Modification Areas, six sites are recommended eligible for the National Register of Historic Places. These sites include 42SV3209, 42SV3211, 42SV3212, 42SV3213, 42SV3247 and 42SV3248 which consist of small rock shelters and rock shelters with pictographs. Site 42SV3209 will be the only site undermined under the present mine plan. This shelter is more of a terrace overhang that extends 6 meters long, with a 1.5 meter overhang or width.

South Fork of Quitchupah 2R2S Block "A" Area

Cultural and Historic Information. Cultural resource information and maps identifying cultural and historical study areas are located in Appendix 4-2 in the Confidential folder of the M&RP. Canyon Environmental conducted an intensive evaluation of the South Fork of Quitchupah Area.

The results of the cultural resource inventory for the project resulted in the identification of 4 cultural resource sites, which included one previously recorded site (42SV2690), and 3 new sites (42SV3462, 42SV3463 and 42S3464). Overall, the identified cultural resource sites consist of lithic scatters and a small rock shelter/overhang. Of the 4 sites identified within the South Fork of

Quitchupah Area, two sites are recommended eligible for the National Register of Historic Places. These sites include 42SV2690 which consists of a lithic scatter and 42SV3464 which consists of a lithic scatter associated with a small rock shelter. Both sites will be undermined under the present mine plan. This shelter is more of a terrace overhang that measures approximately 1.5 meters high and 4 meters wide at the opening and extends 1.5 meters beneath the rock to a tapered edge. The shelter shows signs of modern disturbance and it appears that some of the fill material has been disturbed by minor looting activities.

The monitoring, treatment plan and mitigation of the cultural resource sites will be in accordance with the Memorandum of Agreement (MOA), and any amendment to it, between the U.S. Forest Service, Utah State Historic Preservation Office (SHPO), and Canyon Fuel Company, LLC located in Appendix 4-6.

The Applicant agrees, however, to notify the regulatory authority and the Utah State Historical Preservation Office (SHPO) of previously unidentified cultural resources discovered in the course of mining operations. The Applicant also agrees to have any such cultural resources evaluated in terms of National Register of Historic Places eligibility criteria.

4.1.1.2 Previous Mining Activity

Portions of the mine plan area were mined prior to the filing of this permit application. SUFCO Mine began a small operation mining the Upper Hiawatha Coal seam in 1941. There was no previous mining activity prior to the 1941 SUFCO operation.

From 1941 through 1974, the coal was removed by conventional mining techniques. From 1974 through 1978, both conventional and continuous mining methods were used. From 1978 until October 1985, all mining used continuous mining methods. Since October 1985 both continuous mining and longwall mining methods have been used. The portion of the seam mined by conventional methods was only partially extracted leaving all pillars for support. The majority of the mining done has been full extraction. All longwall mining is full extraction.

CHAPTER 5
ENGINEERING

stream channel or reduction in stream flows were noted as a result of undermining that portion of Burnout Canyon using the approved mining schedule.

A weekly report will be submitted via e-mail to the Division detailing the results of the inspections. The reports will include, but not necessarily be limited to: a map illustrating the current location of the longwall face; descriptions and dates of field activities; noted changes in stream and local geomorphology; location, width, frequency of cracks; and a description of repairs, if any, conducted. If the prescribed inspections cannot be conducted, the reason for the missed inspection and a record of the attempt to conduct the inspection will be submitted to the Division in the weekly report. The Division will be notified immediately after mining-induced cracks, if any, are found in the East Fork stream channel and the steps taken or planned to be taken as mitigation. Thereafter, the Division will be advised of continuing mitigation efforts, if needed, in the weekly report.

A copy of the October 2003 "Monitoring and Mitigation Plan for Mining Under the East Fork of Box Canyon" prepared by the Division and reviewed and accepted by the Forest with some modifications has been included in Appendix 3-10. The preceding paragraphs have been prepared based on this plan. Sufco will meet all of the monitoring and mitigation responsibilities described in the plan as it pertains to the undermining of the East Fork of Box Canyon.

South Fork of Quitchupah 2R2S Block 'A' Subsidence Monitoring and Mitigation

Portions of the South Fork of Quitchupah where alluvial and the Price River Formation cover overlying the Castlegate Sandstone exceeds a thickness of 10 feet will be undermined and subsided as longwall panel 2R2S is extracted. A monitoring and mitigation plan that is more intensive than the general permit Mining and Reclamation Plan area has been proposed for monitoring surface and ground water flows, subsidence cracks and repair of the cracks in the portions of the South Fork of Quitchupah channel to be undermined. The subsidence portion of the monitoring and mitigation plan program is discussed in detail in the following text.

Prior to the initiation of undermining and subsidence, a pre-subsidence survey of the stream channel will be conducted in the portion of South Fork of Quitchupah to a location above the gate roads associated with that flows over the 2R2S panel and associated gate roads. The survey will consist of a gain/loss survey of the condition of flow within the stream channel paying particular ~~note~~ attention to surface flows and ground water discharge, soil conditions, and the general channel geomorphology of the area. A similar study was performed in the past but all stream measurements were not conducted on the same date. The second gain/loss survey will be completed on a single day at or near base flow conditions late in the summer or early fall of 2011. The mine will attempt, as part of this second survey, to occupy the same monitoring sites in the panel area as those chosen in the initial survey. The monitoring of surface and ground water flows are discussed in greater detail in Section 7.3.1.2.

The subsidence monitoring plan for the South Fork of Quitchupah will include frequent inspection of the stream channel during and after active subsidence. While mining is occurring under the stream channel, and within the 15-degree angle-of-draw above the active longwall face, that area of the channel will be inspected ~~every two weeks~~ semi-weekly for subsidence cracks or other related features. As the longwall face advances and the 15-degree angle-of-draw area follows, the portions of the channel that now lie outside the 15-degree angle-of-draw will be monitored for subsidence features on a quarterly basis for two years following the cessation of subsidence related effects, if any, due to mining.

Mitigation of cracks that ~~would appear to interrupt or divert flows from the stream channel~~ will be sealed immediately with bentonite ~~an appropriate impermeable grout or, in some cases, native materials~~. ~~Sufco will use hand placement methods when sealing cracks with bentonite, with an adequate volume of bentonite, in powder, granular, and/or chip form, to seal small cracks. The bentonite may be placed by pouring it directly into the crack and hydrating with stream water or, if in an actively flowing portion of the stream, temporarily diverting the flow around successive portions of the crack using native soils and placing the bentonite in the exposed section of the crack until the crack is sealed.~~ Sufco will attempt to seal cracks with the least intrusive methods (typically hand placement of grout or native materials) first. The sealing material may be placed by pouring it directly

into the crack or, if cracks occur in an actively flowing portion of the stream, the stream may be temporarily diverting using native materials (or a designed flume if necessary to maintain the flow) until the crack is sealed. If cracks are present in channel walls defined by soil, the soil cracks will be hand filled using a native soil/bentonite mix. The sealing of the channel floor and walls will be accomplished with hand tools such as shovel, picks, trowels, etc. ~~In the unlikely event that cracks too large to be sealed through the efforts of one or two persons in one day do occur and it appears there is a danger of water being diverted from the channel for an extended period of time, arrangements will be made to get additional help to the site as soon as possible.~~

As a backup plan, in the unlikely event that cracks too large to be sealed through the efforts of one or two persons in one day do occur and it appears there is a danger of water being diverted from the channel for an extended period of time, the stream will be temporarily diverting using native materials and a pipe to carry the flow over the crack to maintain the channel flow. Arrangements will be made to get a contractor to the site as soon as possible to repair the crack after consultation with the Forest Service.

There may be sections of the stream channel that may require more intensive mitigation efforts to restore surface flows in the creek. These efforts could include the drilling of closely spaced shallow boreholes in and adjacent to the stream channel and the injection of an acceptable impermeable grout into the alluvium or bedrock. The work will be accomplished either using hand tools or low impact equipment to minimize surface disturbance. Existing roads and turnouts will be used as staging areas to locate larger equipment and supplies. Any hoses or lines will be transported from the staging areas to the nearby worksites either by hand, the use of pack animals, or by helicopter. This work will be done with a contractor selected after consultation with the Forest Service.

Additionally, it may be required to remove loose rock from the channel floor, either where the channel flows across thin-bedded bedrock or where large rock have fallen into the channel and is impeding flows. In the instance of the former, past experience has shown this can occur in the upper Blackhawk Formation and is easily repaired by removing enough of the broken channel surface to again expose the stream flow. In the instance of the later, removal of large rocks could be

accomplished by drilling and then fracturing the rock into smaller fragments more easily moved to locations where they are not impeding flow. This work may be completed using available pneumatic or hydraulic tools that do not require road or pad building disturbances. In the unlikely event that large boulders do need to be moved, pumps and tanks necessary to complete the work will be located in pre-disturbed areas, such as roads or turnouts, and hoses will be walked into the work area.

A copy of the 2012 "Monitoring and Mitigation Plan for Undermining the South Fork of Quitcupah 2R2S Block "A" has been included in Appendix 3-14. The preceding paragraphs have been prepared based on this plan. Sufco will meet all of the monitoring and mitigation responsibilities described in the plan as it pertains to the undermining of the South Fork of Quitcupah 2R2S Block "A".

Sufco will conduct longwall mining operations in such a manner as to minimize surface disturbance while mining within the 15-degree angle-of-draw area that includes the South Fork stream channel. This will be accomplished by advancing the longwall on a schedule where mining will not be suspended for a period to exceed 48 hours.

A bi-weekly (once every two weeks) report on the impacts to stream flow and required mitigation, if any, will be submitted via e-mail to the Division and the forest detailing the results of the inspections while mining is occurring under the stream channel. The reports will include, but not necessarily be limited to: a map illustrating the current location of the longwall face; descriptions and dates of field activities; noted changes in stream and local geomorphology; location, width, frequency of cracks; and a description of repairs, if any, conducted. If the prescribed inspections cannot be conducted, the reason for the missed inspection and a record of the attempt to conduct the inspection will be submitted to the Division and the forest in the report. The Division and the forest will be notified immediately after mining-induced cracks, if any, are found in the South Fork stream channel and the steps taken or planned to be taken as mitigation. Thereafter, the Division and the forest will be advised of continuing mitigation efforts, if needed, in the report.

Though not anticipated, short segments of Cowboy Creek could be subsided in the SITLA Muddy Tract. If this is anticipated to occur, Sufco, will submit a plan for mitigation to address, if it occurs, adverse impacts to Cowboy Creek. With the approval of the Division and concurrence of the Forest, Sufco will instigate a flow monitoring plan similar to the plan implemented prior to the undermining of the East Fork of Box Canyon. If mitigation of surface cracks are required, methods similar to those proposed and implemented in the East Fork of Box Canyon as described above could be used.

Mining within the area of the East Fork of the Box Canyon, South Fork of Quitcupah and within the area of Cowboy Canyon in the SITLA Muddy Tract will be conducted in accordance with State and Federal rules and regulations and the requirements and stipulations presented in the BLM's Conditions of Approval of the Resource Recovery and Protection Plan (July 31, 2003) located in Appendix 1-2. A survey of the water quality and quantity of surface and groundwater, including State appropriated waters, within the SITLA Muddy Tract has been completed. The results of the area survey are included in the PHC for the SITLA Muddy Tract and included in Appendix 7-20. Ground and surface waters in the tract that have attached rights are listed in Appendix 7-1.

A discussion regarding the methods Sufco would employ to mitigate and replace an adversely affected State appropriated water supply is provided in Chapter 7, Section 7.3.1.8.

5.2.5.2 Subsidence Control

Adopted Control Measures. As indicated above, SUFCO Mine has adopted subsidence-control measures in areas where surface resources are to remain protected. These controls consist primarily of leaving support pillars in place in those areas designated on Plates 5-10A, 5-10B & 5-10C as not planned for subsidence. Based on experience and data collected from the lease area, the design of support pillars for those areas where subsidence is not planned has been based on the following equations:

$$SF = SD/OS \quad (5-1)$$

where SF = safety factor against pillar failure (fraction)

$$\begin{aligned} SD &= \text{support strength density (psi)} \\ &= (Y_c)(1-ER) \end{aligned}$$

Y_c = average compressive yield strength of the coal (psi)
= 3090 psi for the Upper Hiawatha seam

ER = extraction ratio (fraction)
= $1 - (A_p/A_t)$

A_p = pillar area (ft²)

A_t = area supported by pillar (ft²)

OS = overburden stress (psi)
= $(d)(D_o)/144$

d = overburden depth (ft)

D_o = overburden density (lb/ft³)
= 160 lb/ft³ for the lease area

Based on these equations and data, the support pillar designs summarized in Table 5-3 have been derived. This equation does not take into account either size effect or shape effects and is based on a one-dimensional stress field. Historically this equation has provided good results when used in areas where a number of uniform pillars are extracted. One area (5 North panels) of the mine experienced pillar failure when the area was flooded with water after mining of the panels had been completed. This particular area was mined using a double pass technique and the mining height was from 14 to 18 feet. The resulting pillars varied from 25 feet x 25 feet to 40 feet x 40 feet. The underlying floor was a weak mudstone that lost its cohesive strength when wet. When the 1R5N and 2R5N panels were flooded the underlying mudstone became saturated and lost its cohesive strength. This allowed the pillars in the area with $SF < 2.5$ to fail, because frictional confinement on the bottom of the pillar was lost. To prevent reoccurrence the Applicant will commit to not flood areas of the mine that have small pillars and a weak mudstone floor in areas where subsidence is to be prevented.

Compliance With Control Plan. SUFCO Mine will comply with all provisions of the approved subsidence control plan.

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HYDROLOGY

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- 7-25 North Water Mitigation Plan
- 7-26 Probable Hydrologic Consequences of Longwall Coal Mining of 2R2S Block "A" at the Canyon Fuel Company, LLC Sufco Mine, Salina, Utah

TABLE 7-2
Water Monitoring Program

<u>Monitoring Wells</u>	<u>Protocol</u>	<u>Comments</u>
US-80-2	A	Screened in Castlegate Sandstone
US-80-4	B	Screened in Castlegate Sandstone
89-20-2W	A	Screened in Castlegate Sandstone
US-79-13	B	Screened in Blackhawk Formation
US-81-3	A	Screened in Blackhawk Formation
US-81-4	A	Screened in Blackhawk Formation
01-8-1	A	Screened in Blackhawk Formation
 <u>Streams</u>		
SUFCO 006	C,2	Upper South Fork Quitchupah Creek
SUFCO 006A	F,1	Upper South Fork Quitchupah Creek
SUFCO 006B	F,1	Upper South Fork Quitchupah Creek
SUFCO 006C	F,1	Upper South Fork Quitchupah Creek
SUFCO 007	C,2	Upper North Fork Quitchupah Creek
SUFCO 041	C,2	Lower Quitchupah Creek
SUFCO 042	C,2	Lower North Fork Quitchupah Creek
SUFCO 046	C,2	Upper Quitchupah Creek
SUFCO 047A	C,2	Lower East Spring Canyon Creek
SUFCO 090	C,1	Upper Box Canyon Creek
Pines 106	C,2	Upper East Fork Box Canyon
Pines 302	C,1	Muddy Creek-Last Water Creek Confluence
Pines 403	C,2	Lower Box Canyon Creek
Pines 405	C,1	Muddy Creek - Box Creek Confluence
Pines 406b*	C,1	Lower Muddy Creek
Pines 407	C,1	Box Canyon Creek
Pines 408	C,1	East Fork Box Canyon Creek
USFS-109	C,1	Upper Main Fork of Box Canyon Creek
Link 001	C,2	Link Canyon Drainage
Link 002	C,2	Link Canyon Drainage
FP-1	G,6	East Fork of Main Fork of Box Canyon
FP-2	G,6	East Fork of East Fork of Box Canyon
M-STR4	C,1	Cowboy Creek

*Monitoring point Pines 406 was moved downstream to the USGS monitoring point in 1999 and renumbered as Pines 406b. The point is located in the NW1/4NE1/4, Sec. 21, T21S. R6E.

TABLE 7-2 (Continued)
Water Monitoring Program

<u>Springs</u>	<u>Protocol</u>	<u>Comments</u>
SUFCA 001	D,3	Blackhawk Formation
SUFCA 047	D,4	Star Point Sandstone
SUFCA 057A	D,3	North Horn Formation
SUFCA 089	E,3	Castlegate Sandstone
GW-8	D,5	Price River Formation
GW-9	D,5	Price River Formation
GW-13	D,3	North Horn Formation
GW-20	D,5	Castlegate Sandstone
GW-21	D,3	Castlegate Sandstone
Pines 100	D,4	Castlegate Sandstone
Pines 105	D,3	Castlegate Sandstone
Pines 206	D,5	Blackhawk Formation
Pines 209	D,5	Blackhawk Formation
Pines 212	D,5	Blackhawk Formation
Pines 214	D,5	Blackhawk Formation
Pines 218	D,3	Castlegate Sandstone
Pines 303	D,3	Blackhawk Formation
Pines 310	D,7	Castlegate Sandstone
Pines 311	D,7	Castlegate Sandstone
Link Portal-West	D,4	Link Canyon Portal
Link Portal-East	D,4	Link Canyon Portal
M-SP01	D,3	Price River Formation
M-SP02	D,3	Price River Formation
M-SP08	D,3	North Horn Formation
M-SP18	D,3	Price River Formation
M-SP39	D,3	Price River Formation
M-SP53	D,3	North Horn Formation
Mud Spring	D,5	Price River Formation
Broad Hollow	D,5	Blackhawk Formation
006A Spring	H,3	Price River Formation
Roberts Spring	H,3	Price River Formation
RS-A	H,3	Price River Formation
RS-B	H,3	Price River Formation

TABLE 7-3
Field and Laboratory Measurement Protocol

Water level and flow measurements

- A Monitoring well: quarterly water level measurement
- B Monitoring well: annual water level measurement (3rd quarter)
- C Stream: quarterly discharge measurements
- D Spring: quarterly discharge measurements
- E Spring Pool: quarterly water level measurement
- F Stream: Bi-weekly measurements while mining is occurring under the stream in 2013, thereafter quarterly for two years.
- G Stream: identify perennial portion of stream on or near October 1 of each year.
- H Spring: Quarterly measurements while mining is occurring under the 2R2S panel stream in 2013, thereafter quarterly for two years.

Water quality

- 1 Stream: quarterly surface water quality field measurements
- 2 Stream: quarterly surface water quality operational laboratory measurements
- 3 Spring: quarterly groundwater quality field measurements
- 4 Spring: quarterly groundwater quality operational laboratory measurements
- 5 Spring: groundwater quality operational laboratory measurements quarterly for two (2) years, then reverting to quarterly water quality field measurements
- 6 Stream: flow measurements only, no water quality samples required.
- 7 Spring: initially ground water field measurements June 2006 through December 2006 as accessible then quarterly groundwater field measurements thereafter.

essentially no tritium. Modern surface waters contain abundant tritium. They visited this site again in June 1996 and located several springs in the drainage several hundred feet above where samples are collected and classified the site as a spring-monitoring site. Nevertheless, Mayo now agrees with SUFCO that this site should be considered a surface water site for monitoring purposes because, at times, this drainage has flow which is contributed by snow melt, precipitation, or sediment pond discharge.

Monitoring sites are sampled three times per year. Surface water monitoring data are submitted to UDOGM by the end of the quarter following sampling. Monitoring data are submitted in an annual summary by March 31 of the subsequent year. UPDES reporting requirements will be met for the three UPDES discharge sites at the mine (see Appendix 7-7).

To better understand the effects that mining will have, if any, on the stream flows within Box Canyon, surface water monitoring sites Pines-407 and Pines-408 will be monitored for stream flows in gallons per minute once every week during the months of June, July, August, September, and October in 1999. Starting in the year 2000, sites 407 and 408 will be monitored once a month in July, August, September, and October for a five year period. If analysis of the data shows no significant changes during this time period, monitoring at these points will be eliminated from the water monitoring program on Table 7-2. Flow measurements at these two sites will be obtained on the same day. Also, the operator will endeavor to obtain the required samples at least five days after the last precipitation event in the drainage area.

To better understand the effects that mining will have, if any, on the stream flows within the South Fork of Quitchupah, surface water monitoring sites SUFCO 006A and SUFCO 006B will be monitored quarterly starting in 2010 for stream flows in gallons per minute and once every two weeks when accessible while mining is occurring within the 15 degree angle-of-draw of the stream channel. **An additional surface water monitoring site SUFCO 006C will be monitored quarterly starting in 2011.** Once mining has been completed within the angle-of draw, the sites will be monitored on a quarterly basis for two years after mining has progressed past the 15 degree angle-of-draw. If analysis of the data shows no significant changes during this time period, monitoring at these points will be eliminated from the water monitoring program on Table 7-2. Flow measurements at these ~~two~~**three** sites will be obtained on the same day.

1. Determine if ground water discharge in the area of Pines 105 and Joes Mill Pond springs continue to discharge to the alluvium;
2. Monitor and evaluate the effects of mining on the surface and subsurface water in the Pines 310 and Pines 311 spring areas; and
3. Determine the potential for completing and operating ground water wells in the spring areas as part of the spring site mitigation activities.

The piezometers/wells completed as part of this project will be monitored on a bi-weekly basis through December 2006 or as accessible. Transducers with data loggers will be placed in several of the piezometers to record data on a more continuous basis. The monitoring frequency of the piezometers/wells after December 2006 will be dependant upon the results of the drilling investigation and the impacts to springs Pines 310, 311, 105, and the Joes Mill Pond of mining the 6LPE panel in the fall and winter of 2006.

A report detailing the results of the drilling and piezometer/ well installation and completion will be submitted to the Division by the end of October 2006. Water level data collected from the piezometers/wells will be reported to the Division electronically within two weeks at the end of each the month through December 2006. The Division will also be notified within three days via e-mail or telephone of significant changes to ground water elevations in Pines 310, 311, 105 spring areas as the 6LPE longwall panel is mined. A report compiling the water level data and interpretation of the data will be submitted to the Division by the end of January 2007.

Based on the findings of the investigation, Sufco will submit to the Division either additional plans (if water is not found in the Pines 105 and Joes Mill Pond area, additional bedrock drilling may be required to locate a suitable source of ground water) or a final plan for mitigation of the effected spring areas.

South Fork of Quitchupah 2R2S Block "A" Monitoring and Mitigation Plan

A monitoring and mitigation plan that is more intensive than the general Mining and Reclamation Plan area has been proposed for monitoring water flows, subsidence cracks, and repair of the cracks in the portions of the South Fork of Quitchupah channel to be undermined. This plan is outlined below.

Prior to the initiation of undermining and subsidence, a pre-subsidence survey of the stream channel will be conducted in the portion of South Fork of Quitchupah that flows over the 2R2S Block "A" panel and associated gate roads. The survey will consist of a gain/loss survey of flow within the stream channel paying particular attention to surface flows and ground water discharge, soil conditions, and the general channel geomorphology. A similar study was performed in the past but all stream measurements were not conducted on the same date. The second gain/loss survey will be completed on a single day at or near base flow conditions late in the summer or early fall of 2011. The mine will attempt, as part of this second survey, to occupy the same monitoring sites in the panel area as those chosen in the initial survey.

Two weeks before and then once every two weeks after subsidence mining begins, the measuring locations occupied during the gain/loss survey will be reoccupied and flow measurements of the stream flow will be obtained. The approximate locations of these sites are illustrated on Figure 7-9. The once every other week flow measurements will be supplemented by visual observations of flow performed twice a week or once every three to four days. Flow/no flow conditions will be described on these days. If no flow or diminished flows are noted, the appropriate mine and Forest personnel will be contacted and the mitigation plan to restore flows will be implemented.

Semi-weekly flow observations and visual inspections will continue for at least 12 weeks, or as conditions allow, after the completion of mining under the stream channel. The bi-weekly (once every two weeks) stream flow monitoring will continue for at least four weeks, or as conditions and monitoring results indicate necessary, after the completion of subsidence mining under the stream channel. The monitoring plan will then change to quarterly flow and field parameter measurements for two years at three sites: one upstream of the panel, one within the panel, and one downstream of the panel. The location of these new temporary monitoring sites are listed in Table 7-2 and shown on Plate 7-3 and labeled as sites 006A, 006B, and 006C. Additional flow monitoring may be needed to determine specific locations where flow is being lost, and treatments are needed.

The subsidence monitoring plan for the South Fork of Quitchupah will include frequent inspection of the stream channel during and after active subsidence. While mining is occurring under the stream channel, and within the 15-degree angle-of-draw above the active longwall face, that area of the channel will be inspected semi-weekly for subsidence cracks or other related features.

As the longwall face advances and the 15-degree angle-of-draw area follows, the portions of the channel that now lie outside the 15-degree angle-of-draw will be monitored for subsidence features on a quarterly basis for two years following the cessation of subsidence related effects, if any, due to mining.

Mitigation of cracks that interrupt or divert flows from the stream channel will be sealed immediately with an appropriate impermeable grout or, in some cases, native materials. Sufco will attempt to seal cracks with the least intrusive methods (typically hand placement of grout or native materials) first. The sealing material may be placed by pouring it directly into the crack or, if cracks occur in an actively flowing portion of the stream, the stream may be temporarily diverted using native materials (or a designed flume if necessary to maintain the flow) until the crack is sealed. If cracks are present in channel walls defined by soil, the soil cracks may be hand filled using a native soil/bentonite mix. The sealing of the channel floor and walls will be accomplished with hand tools such as shovel, picks, trowels, etc.

As a backup plan, in the unlikely event that cracks too large to be sealed through the efforts of one or two persons in one day do occur and it appears there is a danger of water being diverted from the channel for an extended period of time, the stream will be temporarily diverting using native materials and a pipe to carry the flow over the crack to maintain the channel flow. Arrangements will be made to get a contractor to the site as soon as possible to repair the crack after consultation with the Forest Service.

There may be sections of the stream channel that may require more intensive mitigation efforts to restore surface flows in the creek. These efforts could include the drilling of closely spaced shallow boreholes in and adjacent to the stream channel and the injection of an acceptable impermeable grout into the alluvium or bedrock. The work will be accomplished either using hand tools or low impact equipment to minimize surface disturbance. Existing roads and turnouts will be used as staging areas to locate larger equipment and supplies. Any hoses or lines will be transported from the staging areas to the nearby worksites either by hand, the use of pack animals, or by helicopter. This work will be done with a contractor selected after consultation with the Forest Service.

Additionally, it may be required to remove loose rock from the channel floor, either where the channel flows across thin-bedded bedrock or where large rock have fallen into the channel and

is impeding flows. In the instance of the former, past experience has shown this can occur in the upper Blackhawk Formation and is easily repaired by removing enough of the broken channel surface to again expose the stream flow. In the instance of the later, removal of large rocks could be accomplished by drilling and then fracturing the rock into smaller fragments more easily moved to locations where they are not impeding flow. This work may be completed using available pneumatic or hydraulic tools that do not require road or pad building disturbances. In the unlikely event that large boulders do need to be moved, pumps and tanks necessary to complete the work will be located in pre-disturbed areas, such as roads or turnouts, and hoses will be walked into the work area.

Sufco will conduct longwall mining operations in such a manner as to minimize surface disturbance while mining within the 15-degree angle-of-draw area that includes the South Fork stream channel. This will be accomplished by advancing the longwall on a schedule where mining will not be suspended for a period to exceed 48 hours.

A copy of the 2012 "Monitoring and Mitigation Plan for Undermining the South Fork of Quitcupah 2R2S Block "A" has been included in Appendix 3-14. The preceding paragraphs have been prepared based on this plan. Sufco will meet all of the monitoring and mitigation responsibilities described in the plan as it pertains to the undermining of the South Fork of Quitcupah 2R2S Block "A".

A bi-weekly (once every two weeks) report on the impacts to stream flow and required mitigation, if any, will be submitted via e-mail to the Division and the Forest detailing the results of the inspections while mining is occurring under the stream channel. The reports will include, but not necessarily be limited to: a map illustrating the current location of the longwall face; descriptions and dates of field activities; noted changes in stream and local geomorphology; location, width, frequency of cracks; and a description of repairs, if any, conducted. If the prescribed inspections cannot be conducted, the reason for the missed inspection and a record of the attempt to conduct the inspection will be submitted to Division and the Forest in the report. Division and the Forest will be notified immediately after mining-induced cracks, if any, are found in the South Fork stream channel and the steps taken or planned to be taken as mitigation. Thereafter, Division and the Forest will be advised of continuing mitigation efforts, if needed, in the report.

~~Sufco anticipates undermining and subsiding a portion of the South Fork of Quitchupah beginning in 2013 when the mine starts longwalling panel 2R2S. A surface and ground water monitoring and mitigation program more intensive than the general monitoring plan described previously in this Section will be initiated in this area prior to subsidence occurring within the 15-degree angle-of-draw of the stream channel. This monitoring program will include conducting a pre-mining subsidence survey of the portion of the South Fork of Quitchupah over the 2R2S panel that will be undermined and will incorporate a gain/loss survey of the stream channel from a location above the gate road of the 2R2S panel. Besides the existing South Fork of Quitchupah monitoring site (SUFCO 006), two additional temporary monitoring sites (SUFCO 006A, and SUFCO 006B) have been identified above and below the portion of the South Fork where the monitoring of surface and/or ground water flows, and general geomorphology will occur. These new temporary monitoring sites are listed in Table 7-2 and their locations are shown on Plate 7-3. Stream monitoring sites will be monitored specifically for stream flow.~~

~~The surface and/or ground water flows at these stations will be monitored on a bi-weekly basis while mining is occurring within the 15 degree angle-of-draw of the stream channel. Once mining has been completed within the angle-of draw, the sites will be monitored on a quarterly basis for two years after mining has progressed past the 15 degree angle-of-draw. Table 7-2 presents the monitoring site numbers, monitoring parameters, and the frequency of monitoring. A report on the impacts, if any, to the stream or ground water flows, general geomorphology, location of the longwall, etc., will be provided via e-mail to the Division while mining is occurring under the stream channel.~~

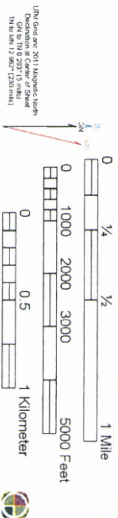
~~Monitoring for subsidence cracks within the stream channel of the South Fork of Quitchupah Creek will also be part of this intensive monitoring and mitigation plan. The details of the mitigation plan are discussed in greater detail in Section 5.2.5.1 of this M&RP. The subsidence monitoring program will consist of inspecting the stream channel floor within the active 15 degree angle-of-draw on a bi-weekly basis. Mining induced subsidence effects, such as cracks, slumps, offsets, etc., will be identified, mapped, and a brief narrative of the effects will be recorded and forwarded to the Division. A report will be provided via e-mail to the Division on the results of the subsidence monitoring and mitigation activities while mining is occurring under the stream. A summary report to the Division documenting the pre- and post-mining conditions of the stream channel will be submitted 90 days after subsidence monitoring is complete for the 2R2S panel. This report will include a description of all activities and work conducted by Sufco for stream~~

~~channel evaluation and mitigation. All identified impacts and mitigation efforts will be documented. The results of mitigation, if performed, will be discussed.~~

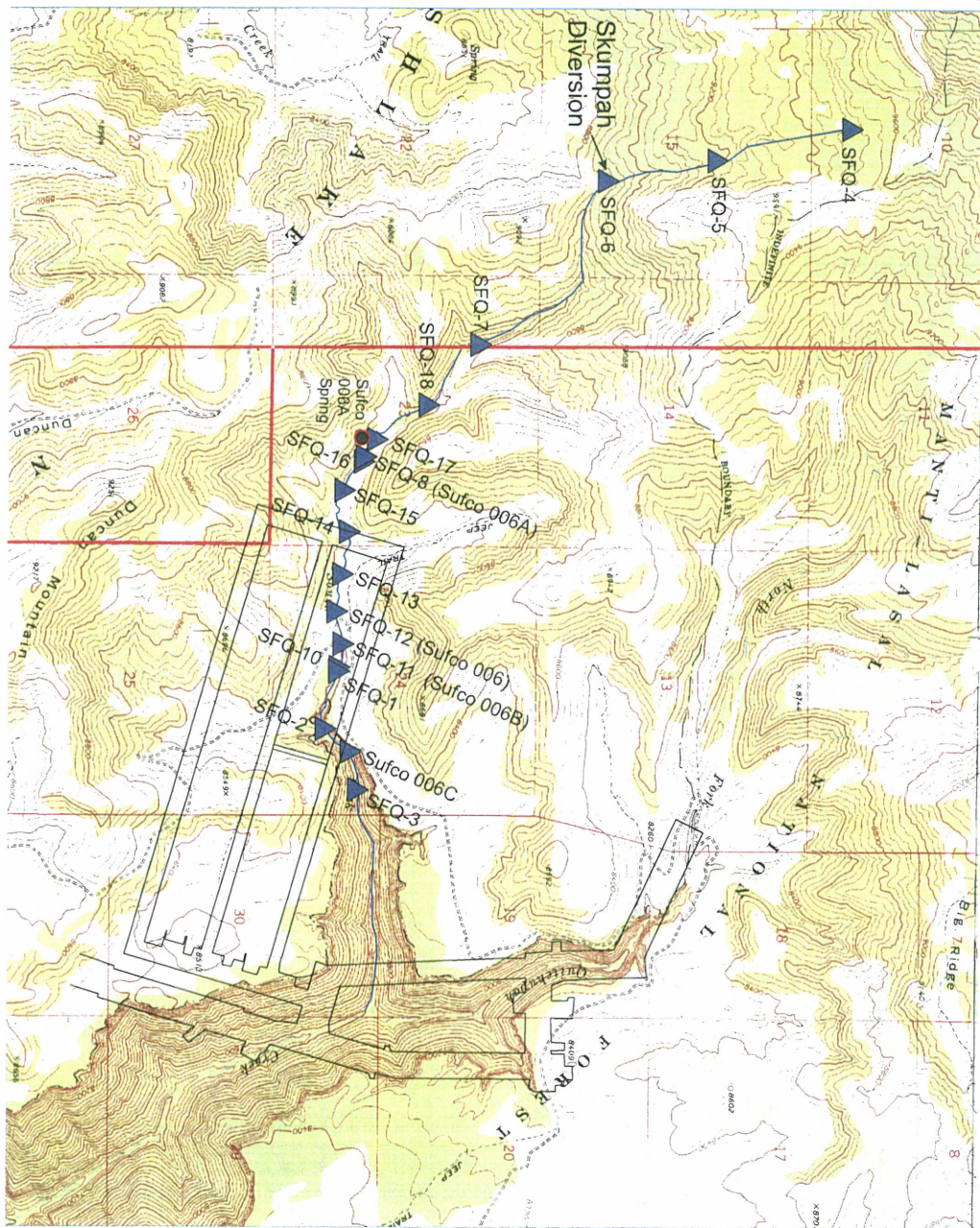
Prior to implementation of any mining-induced subsidence mitigation efforts in the stream channel as described in Chapter 5, a Stream Alteration Permit will be obtained from the Utah Division of Water Rights. Sufco will have the alteration permit(s) prior to undermining the South Fork of Quitchupah stream channel since the mitigation efforts will occur as soon as possible after a need for mitigation is determined.

~~Every reasonable attempt will be made by Sufco to implement and follow the monitoring program schedule. If access is limited due to snow or inclement weather, the mine's effort to access the area will be documented in the report to the Division. The time of the access attempt, weather conditions, and reason(s) for failing to monitor the South Fork of Quitchupah sites will be provided in the report.~~

1927 North American Datum: UTM grid zone 12
 Generated by BigTop07 (www.igage.com)
 Map compiled from USGS Quads: Accord Lakes, UT Heliotrope Mountain, UT



38° 56' 51.727" N
 111° 27' 33.570" W



111° 27' 34.784" W
 38° 59' 59.676" N

111° 22' 33.716" W
 39° 0' 0.754" N

Figure 7-9
 South Fork Quitchupah Monitoring Locations

7.3.1.3 Acid- and Toxic-Forming Materials

Results of monitoring of mine discharge, surface, and groundwater, indicate that no impact to these waters from acid- and toxic-forming materials has been found in the permit and adjacent areas (Section 7.2.8.3). Parameters defining acid- and toxic-forming materials continue to be monitored as described in Volume 3 of this M&RP. In the event that acid- or toxic-forming materials are identified, they will be disposed of in the waste rock disposal area. The treatment of these materials will be handled as indicated in Volume 3 of this M&RP.

7.3.1.4 Transfer of Wells

Before final release of bond, exploration or monitoring wells will be sealed in a safe and environmentally sound manner in accordance with R645-301-631, R645-301-738, and R645-301-765. Ownership of wells will be transferred only with prior approval of the UDOGM. The conditions of such a transfer will comply with State and local laws. SUFCO will remain responsible for the management of the well until bond release in accordance with R645-301-529, R645-301-551, R645-301-631, R645-301-738, and R645-301-765.

7.3.1.5 Discharges

APPENDIX 1-2

Lease Documents



50,002

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Utah State Office
P.O. Box 45155
Salt Lake City, UT 84145-0155
<http://www.blm.gov/ut/st/en.html>



IN REPLY REFER TO:
3452
UTU-28297
SUFCO LMU
(UT-923)

JAN 17 2012



CERTIFIED MAIL – 7011 1150 0000 6739 8566
Return Receipt Requested

DECISION

Canyon Fuel Company, LLC	:	Coal Lease
c/o Ark Land Company	:	UTU-28297
City Place One, Suite 300	:	
St. Louis, MO 63141	:	

Coal Lease Partial Relinquishment Decision Amended

On December 15, 2011, a decision approving a partial relinquishment of the above noted federal coal lease was issued by this office.

A determination has been made that the legal description of the retained lands in the partial relinquishment decision were in error. The relinquished and retained lands are described as follows:

Coal lease UTU-28297:

Relinquished Lands

T. 21 S., R. 5 E., SLM, Utah
Sec. 32, lots 2-4;
Sec. 33, lot 1.

T. 22 S., R. 5 E., SLM, Utah
Sec. 4, lot 4, SW $\frac{1}{4}$ NW $\frac{1}{4}$, W $\frac{1}{2}$ SW $\frac{1}{4}$;
Sec. 5, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$;
Sec. 7, E $\frac{1}{2}$ SE $\frac{1}{4}$;
Sec. 8, S $\frac{1}{2}$, NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$;
Sec. 17, NE $\frac{1}{4}$, N $\frac{1}{2}$ NW $\frac{1}{4}$;
Sec. 18, NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$.

Containing 1,915.47 acres

Retained Lands

T. 21 S., R. 5 E., SLM, Utah
Sec. 32, lot 1, N $\frac{1}{2}$ S $\frac{1}{2}$;
Sec. 33, NW $\frac{1}{4}$ SW $\frac{1}{4}$.

T. 22 S., R. 5 E., SLM, Utah
Sec. 5, W $\frac{1}{2}$ W $\frac{1}{2}$;
Sec. 7, S $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, W $\frac{1}{2}$ SE $\frac{1}{4}$;
Sec. 8, W $\frac{1}{2}$ NW $\frac{1}{4}$.

Containing 716.51 acres*

The acreages of the relinquished and retained lands remain the same.

Note* that the remaining acreage in this lease may be changed at a later date due to an Amended Protraction Diagram No. 24, which was accepted effective May 19, 2000 and a still pending survey of sections 5, 7, and 8.

When this lease was issued in January of 1979, the lands described in the lease were based on a skeleton survey as allowed in the regulations at 43 CFR 3471.1-2 (Portions of sections 5, 7, 8 and 18 have not been surveyed). Therefore, the calculated acreage remaining in this lease and the acreage of the relinquished lands are based on the skeleton survey and the plat acreage in existence at the time of issuance of the lease.

Roger L Bankert

Roger L Bankert
Chief, Branch of Minerals

cc: Resource Development Coordinating Committee, ATTN: Mineral Leasing Taskforce,
116 State Capital Building, Salt Lake City, Utah 84114
Manti LaSal National Forest
ONRR, ACM, Solid Minerals Staff, Attn: LeeAnn Martin, MS62300B, Box 25165, Denver, CO
80225-0165
Price Field Office (Attn: Steve Falk)
Mr. John Baza, Director, UDOGM, Box 145801, Salt Lake City, Utah 84114-5801
Christina Garcia, Forest Service, Southwest Region, Minerals and Geology, National Operations, 333
Broadway, SE, Albuquerque, NM 87102



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Utah State Office

P.O. Box 45155

Salt Lake City, UT 84145-0155

<http://www.blm.gov>



IN REPLY REFER TO:

3452

UTU-28297

SUFCO LMU

(UT-9223)

DEC 15 2011

Received

DEC 19 2011

Canyon Fuel Company
SUFCO Mine

CERTIFIED MAIL - 7011 1150 0000 6739 5268

Return Receipt Requested

DECISION

Canyon Fuel Company, LLC
c/o Ark Land Company
City Place One, Suite 300
St. Louis, MO 63141

Coal Lease
UTU-28297

Coal Lease Partial Relinquishment Accepted

On April 6, 2009, a partial relinquishment of the above noted federal coal lease was filed in this office by Canyon Fuel Company, LLC.

The partial relinquishment of this lease is approved as of the date of filing. The relinquished lands are subject to the continued obligation of the lessee to make payment of all accrued rentals and royalties and to complete the reclamation of the leased lands.

The relinquished and retained lands are described as follows:

Coal lease UTU-28297:

Relinquished Lands

T. 21 S., R. 5 E., SLM, Utah

Sec. 32, lots 2-4;

Sec. 33, lot 1.

T. 22 S., R. 5 E., SLM, Utah

Sec. 4, lot 4, SW $\frac{1}{4}$ NW $\frac{1}{4}$, W $\frac{1}{2}$ SW $\frac{1}{4}$;

Sec. 5, E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$;

Sec. 7, E $\frac{1}{2}$ SE $\frac{1}{4}$;

Sec. 8, S $\frac{1}{2}$, NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$;

Sec. 17, NE $\frac{1}{4}$, N $\frac{1}{2}$ NW $\frac{1}{4}$;

Sec. 18, NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$.

Retained Lands

T. 21 S., R. 5 E., SLM, Utah

Sec. 32, lot 1, N $\frac{1}{2}$ S $\frac{1}{2}$;

Sec. 33, NW $\frac{1}{4}$ SW $\frac{1}{4}$.

T. 22 S., R. 5 E., SLM, Utah

Sec. 5, all;

Sec. 7, S $\frac{1}{2}$ NE $\frac{1}{4}$, S $\frac{1}{2}$;

Sec. 8, N $\frac{1}{2}$, SW $\frac{1}{4}$.

Containing 1,915.47 acres

Containing 716.51 acres*

Note* that the remaining acreage in this lease may be changed at a later date due to an Amended Protraction Diagram No. 24 which was accepted effective May 19, 2000 and a still pending survey of sections 5, 7, and 8.

When this lease was issued in January of 1979, the lands described in the lease were based on a skeleton survey as allowed in the regulation in 43 CFR 3471.1-2 (Portions of sections 5, 7, 8 and 18 have not been surveyed). Therefore, the calculated acreage remaining in this lease and the acreage of the relinquished lands are based on the skeleton survey and the plat acreage in existence at the time of issuance of the lease.

The SUFCO Logical Mining Unit (LMU), UTU-73341, must be modified to exclude the relinquished acreage from the existing LMU (43 CFR 3487.1(h)). The modification of an LMU requires a case-by-case processing fee. The following actions will be addressed in this LMU modification:

LMU Action	Effective Date	LMU Acres Relinquished(-) or added(+)	LMU Reserves removed/mined(-) or added(+)(tons)	LMU Reserves remaining (tons)
Partial Relinquishment UTU-28297	4/6/2009	-1,957.47	-4,697,320	3,503,402
Remove Fee	11/2011	-640.00	-4,591,190	0
Partial Relinquishment UTU-63214	5/26/2011	-1869.12	0 (no mining in relinquished acres)	(total shown in lease modification line below)
Lease Modification SL-062583	12/1/2009	+880.00		(a) 24,908,306
Lease Modification UTU-47080	12/1/2009	+795.68		(a) 20,152,248
Lease Modification UTU-63214	12/1/2009	+640.00		(a) 88,234,391
Partial Relinquishment UTU-76195	12/20/2006	-1,477.00	0 (no mining in relinquished acres)	41,678,656

Note: (a) Total LMU Reserves remaining from new R2P2 which trued up the full lease including lease modification areas.

The BLM requests that Canyon Fuels submit a current LMU map so that any discrepancies between Canyon Fuels records and the BLM records can be resolved during this process.

A BLM cost estimate to process the LMU modification is enclosed pursuant to 43 CFR 3473.2(e). If you agree with the fee, please send a check for the estimated amount to the BLM. If you wish to provide comments on the estimated fee, you have 30 days to provide comments and the BLM will review your comments and make any adjustments as necessary. After the 30-day comment period is over, the BLM will mail you a final fee estimate accompanied with a bill. Payment is due within 30 days after receipt of the bill.

The BLM will bill for the entire amount. If in processing the application we encounter higher costs than anticipated, we will provide a revised estimate but processing will not stop. If the final bill is less than estimated then the BLM will refund any unused funds.

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4, and the enclosed Form 1842-1. If an appeal is taken, your notice of appeal must be filed in this office (at the above address) within 30 days after receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition (pursuant to regulation 43 CFR 4.21)(58 FR 4939, January 19, 1993)(request) for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay

Copies of the notice of appeal, petition for stay, and statement of reasons also must be submitted to each party named in this decision and to the Office of the Regional Solicitor, Intermountain Region, 125 South State Street, Suite 6201, Salt Lake City, Utah 84138, at the same time the original documents are filed in this office.


ACTING Juan Palma
State Director

Enclosure
Cost Recovery Worksheet

cc:

Mr. Ken May, SUFCO Mine; Canyon Fuel Company, LLC, 397 South 800 West,
Salina, UT 84654

Resource Development Coordinating Committee, ATTN: Mineral Leasing Taskforce,
116 State Capital Building, Salt Lake City, Utah 84114

Manti LaSal National Forest

ONRR, ACM, Solid Minerals Staff, Attn: LeeAnn Martin, MS62300B, Box 25165,
Denver, CO 80225-0165

Price Field Office (Attn: Steve Rigby)

Mr. John Baza, Director, UDOGM, Box 145801, Salt Lake City, Utah 84114-5801

Christina Garcia, Forest Service, Southwest Region, Minerals and Geology, National Operations,
333 Broadway, SE, Albuquerque, NM 87102

INITIAL
FEE ESTIMATE FOR CASE - BY - CASE PROCESSING
Energy & Mineral Resources Cost Recovery

Application Serial Number: UTU-73341 LMU MODIFICATION
Applicant: SUFCO
Address: Canyon Fuel Company, LLC
c/o Ark Land Company
City Place One, Suite 300
St. Louis, MO 63141
Agent: Same
Address: Same
Application For: Federal LMU UTU-73341
Location: Federal Coal Lease UTU-28297

Other pertinent information

Estimated Processing Requirements:

Is NEPA analysis required? No X Yes _____ Type EIS _____ EA _____ Other DNA
If "yes" will BLM perform NEPA analysis? Yes _____ No _____
If "no" name of 3rd party contractor: _____

Brief description of Processing Step	Estimated Processing Cost
<u>1. Application Receipt</u>	<u>\$180</u>
<u>2. R2P2 Review</u>	<u>\$1,840</u>
<u>3. NEPA Review</u>	<u>\$0</u>
<u>4. Reserve Determination</u>	<u>\$2,490</u>
<u>5. Bond Review</u>	<u>\$150</u>
<u>6. Pre LMU Modification Issue</u>	<u>\$1,130</u>

Total Estimated Fee: \$ \$5,790

Approved by: _____ (Difference due to rounding) Date: _____
BLM Authorized Officer
Approved By: _____ Date: _____
Applicant



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Utah State Office
P.O. Box 45155
Salt Lake City, UT 84145-0155
<http://www.blm.gov>



IN REPLY REFER TO:
3452
UTU-63214
(UT-9223)

MAY 26 2011

CERTIFIED MAIL – Return Receipt Requested

Canyon Fuel Company, LLC
c/o Ark Land Company
City Place One, Suite 300
St. Louis, MO 63141

DECISION

Coal Lease
UTU-63214

Coal Lease Partial Relinquishment Accepted



On April 6, 2009, a partial relinquishment of the above noted federal coal lease was filed in the office by Canyon Fuel Company, LLC.

A determination has been made that the partial relinquishment of this lease may be accepted as of the date of filing. The relinquished lands are subject to the continued obligation of the lessee to make payment of all accrued rentals and royalties and to complete the reclamation of the leased lands.

The relinquished and retained lands are described as follows:

Coal lease UTU-63214:

Relinquished Lands

T. 21 S., R. 5 E., SLM, Utah
Sec. 33, lots 2-4;
Sec. 34, lots 1-4, NE $\frac{1}{4}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$,
N $\frac{1}{2}$ SE $\frac{1}{4}$;
Sec. 35, lots 1 and 2, W $\frac{1}{2}$ NW $\frac{1}{4}$, N $\frac{1}{2}$ SW $\frac{1}{4}$;

T. 22 S., R. 5 E., SLM, Utah
Sec. 3, lots 1-4, S $\frac{1}{2}$ N $\frac{1}{2}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$,
N $\frac{1}{2}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$;
Sec. 4, lots 1 and 2, S $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ SE $\frac{1}{4}$;
Sec. 9, NE $\frac{1}{4}$ NE $\frac{1}{4}$;
Sec. 10, W $\frac{1}{2}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, N $\frac{1}{2}$ SW $\frac{1}{4}$.

Containing 1869.12 acres

Retained Lands Tract 1:

T. 21 S., R. 4 E., SLM, Utah
Sec. 12, E $\frac{1}{2}$ SE $\frac{1}{4}$;
Sec. 13, E $\frac{1}{2}$ NE $\frac{1}{4}$, S $\frac{1}{2}$;
Sec. 14, E $\frac{1}{2}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$;
Sec. 23, E $\frac{1}{2}$, E $\frac{1}{2}$ W $\frac{1}{2}$;
Sec. 24, all;

T. 21 S., R. 5 E., SLM
Sec. 15, W $\frac{1}{2}$;
Secs. 16-21, all;
Sec. 22, W $\frac{1}{2}$;
Sec. 26, W $\frac{1}{2}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ SW $\frac{1}{4}$;
Sec. 27, all;
Sec. 28, N $\frac{1}{2}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$;
Sec. 29, E $\frac{1}{2}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$;
Sec. 30, lot 1, N $\frac{1}{2}$ NE $\frac{1}{4}$;
Sec. 33, NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$;
Sec. 34, NW $\frac{1}{4}$ NE $\frac{1}{4}$, NW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$.

Retained Lands Tract 2:

T. 21 S., R. 5 E., SLM, Utah
Sec. 10, SE $\frac{1}{4}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$;
E $\frac{1}{2}$ E $\frac{1}{2}$ SW $\frac{1}{4}$ NW $\frac{1}{4}$,
E $\frac{1}{2}$ E $\frac{1}{2}$ NW $\frac{1}{4}$ SW $\frac{1}{4}$,
E $\frac{1}{2}$ E $\frac{1}{2}$ SW $\frac{1}{4}$ SW $\frac{1}{4}$.

Retained Lands Tract 3:

T. 21 S., R. 4 E., SLM, Utah
Sec. 26, E $\frac{1}{2}$, E $\frac{1}{2}$ SW $\frac{1}{4}$;
Sec. 35, NW $\frac{1}{4}$, W $\frac{1}{2}$ SW $\frac{1}{4}$.

Containing 8,826.34 acres

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4, and the enclosed Form 1842-1. If an appeal is taken, your notice of appeal must be filed in this office (at the above address) within 30 days after receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition (pursuant to regulation 43 CFR 4.21)(58 FR 4939, January 19, 1993)(request) for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed in this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and


For  Juan Palma
State Director

cc: Resource Development Coordinating Committee, ATTN: Mineral Leasing Taskforce,
116 State Capital Building, Salt Lake City, Utah 84114
Manti LaSal National Forest
ONRR, ACM, Solid Minerals Staff, Attn: LeeAnn Martin, MS62300B, Box 25165, Denver, CO
80225-0165
Price Field Office (Attn: Steve Falk)
Mr. John Baza, Director, UDOGM, Box 145801, Salt Lake City, Utah 84114-5801
Christina Garcia, Forest Service, Southwest Region, Minerals and Geology, National Operations, 333
Broadway, SE, Albuquerque, NM 87102

APPENDIX 3-14

Monitoring and Mitigation Plan for Undermining
the South Fork of Quitchupah 2R2S Block "A"

Monitoring and Mitigation Plan for Undermining the South Fork of Quitchupah 2R2S Block "A"

Implementation of the following mitigation plan will quickly identify surface disturbance or impacts from subsidence fractures intercepting spring and stream flows. Frequent monitoring will establish the degree of impacts to water resources, vegetation, wildlife and other uses.

The monitoring and mitigation plan adopted by the mine will provide sufficient data for all stakeholders associated with these resources and lands to make a determination of the degree of impacts. Information and data will be collected before the area is mined, throughout the mining period, and after mining is past. Monitoring and data collection will continue until the mine, Division and Forest agree that mining impacts, if any, have occurred, have been mitigated, and no further impacts are anticipated.

Hydrological and Subsidence Mitigation Plan for Undermining the South Fork of Quitchupah 2R2S Block "A"

Subsidence R645-301-525.454

- Conduct pre- and post-mining surveys of the undermining the South Fork of Quitchupah 2R2S Block "A" stream channel over panel 2R2S. The mine will conduct a post-mining survey during 2015. This post-mining survey must apply the same procedures as the survey conducted in 2012.
 - o Conduct a stream channel profile survey from 006A above the 2R2S Panel to 006C located below the panel.
 - o Establish at least 4 stations to portray stream flow, vegetation, soils, etc. GPS coordinates shall be obtained for each site. Each site must be documented with fixed photo points that can be reproduced during subsequent monitoring intervals. Four sites include 006, 006A, 006B and 006C.
 - o Establish location of perennial flow, gaining/losing reaches of the stream channel.
 - o Qualified botanist must participate in the survey of the channel.
 - Identify major representative plant species along the stream channel and riparian and spring areas.
 - o Survey and mention all animal species present:
 - Macroinvertebrate presence at water monitoring stations along the stream channel and riparian and spring areas.
 - All other animal species along the stream channel and riparian and spring areas.
- Water monitoring shall be conducted prior to mining under the stream channel.

- While mining under the channel, promptly identify subsidence-induced fractures, dewatering, diminution of water quality, and movement of the stream channel.

- Semi-weekly visual inspections for fractures, stream channel and flow observations while mining within the angle-of-draw of the stream channel. Monitor flow and channel bi-weekly while in the angle of draw. Continue monitoring quarterly for 2-year period after no subsidence, interception, diminution or diversions are identified. However, additional surface and/or groundwater samples will be collected for total iron if a visible iron precipitate is noted within the stream channel or originating from the springs and seep.

- Stockponds 94-115 and 94-116 will be monitored prior to mining and while mining within the angle-of-draw of the stream channel.

- Conduct uninterrupted longwall mining progression, except for normally scheduled maintenance, while under the 15-degree angle-of-draw of the stream channel.

- Provide a bi-weekly (once every two weeks) report to DOGM and the Fishlake National Forest via e-mail. Identify any changes in surface expression, dates, any fracturing of surface (location, width, spacing, etc.), any repairs, and location of longwall.

- If the applicant cannot gain access to the site, due to weather conditions, etc., attempts must be documented.

- Mitigate subsidence cracks and fractures identified within the stream channel wet bank. Access must be limited to methods that would not cause additional effects to the aquatic ecosystem.

- o Mitigation of cracks that interrupt or divert flows from the stream channel will be sealed immediately with an appropriate impermeable grout or, in some cases, native materials. Sufco will attempt to seal cracks with the least intrusive methods (typically hand placement of grout or native materials) first. The sealing material may be placed by pouring it directly into the crack or, if cracks occur in an actively flowing portion of the stream, the stream may be temporarily diverted using native materials (or a designed flume if necessary to maintain the flow) until the crack is sealed. If cracks are present in channel walls defined by soil, the soil cracks may be hand filled using a native soil/bentonite mix. The sealing of the channel floor and walls will be accomplished with hand tools such as shovel, picks, trowels, etc.
- o As a backup plan, in the unlikely event that cracks too large to be sealed through the efforts of one or two persons in one day do occur and it appears there is a danger of water being diverted from the channel for an extended period of time, the stream will be temporarily diverting using native materials and a pipe to carry the flow over the crack to maintain the channel flow. Arrangements will be made to get a contractor to the site as soon as possible to repair the crack after consultation with the Forest Service.
- o There may be sections of the stream channel that may require more intensive mitigation efforts to restore surface flows in the creek. These

efforts could include the drilling of closely spaced shallow boreholes in and adjacent to the stream channel and the injection of an acceptable impermeable grout into the alluvium or bedrock. The work will be accomplished either using hand tools or low impact equipment to minimize surface disturbance. Existing roads and turnouts will be used as staging areas to locate larger equipment and supplies. Any hoses or lines will be transported from the staging areas to the nearby worksites either by hand, the use of pack animals, or by helicopter. This work will be done with a contractor selected after consultation with the Forest Service.

- The applicant will be required to abide by the mitigation outlined in the approved MRP.
- Comply with federal and State rules and regulations.
 - Refer to Conditions of Approval of the Resource Recovery and Protection Plan (R2P2), (June 8, 2011).
 - A stream alteration permit is required by Utah Division of Water Rights for any stream channel construction activities. The mine will obtain a stream alteration permit prior to construction activities within the stream channel.

Water Rights Replacement of State Appropriated Water Supplies (R645-301-731.530)(MRP page 7-58A)

- The mine will promptly provide alternate sources of water, replace or compensate any State appropriated water supply that is contaminated, diminished or interrupted by mining operations for:
 - Wildlife
 - Cattle
 - Drinking water
- Calculate the amount of diminished flows from monitoring data.

Hydrologic and Subsidence Summary Report

- The mine will submit a summary report to the Division documenting the pre- and post-mining conditions of springs and stream channels. The report will describe all activities and work conducted by the mine for site evaluation and mitigation. Further, the report will identify if impacts have occurred, and if mitigation activities have prevented material damage to resources. The report will be due 90 days after subsidence monitoring is complete for the 2R2S Block "A" panel section. The Division will provide a copy of the report to the Fishlake National Forest.

Biology Monitoring Plan for Undermining the South Fork of Quitcupah 2R2S Block "A"

The mine will follow the basics of the Division's Guidelines. A qualified botanist will survey the stream channel and associated spring areas starting from 006A above the 2R2S Panel to 006C located below the panel. A qualified biologist will survey the baseline populations of the macroinvertebrate within the portion of the stream channel to be subsided.

Stream channel and spring geomorphology and vegetation.

The following information will be collected prior to mining:

- Stream channel geomorphology – at a minimum define:
 - Geologic/surface substrate of stream bottom.
 - Width of stream channel at water-monitoring locations.
- Spring and surrounding area geomorphology – at a minimum define:
 - Geologic/surface substrate of spring area where the water discharges.
 - Geologic/surface substrate of the spring *tributary* where water converges from the discharge site(s) and forms a *tributary* of the South Fork Quitcupah stream.
 - Width of the spring *tributary* at the location where the consultant surveys vegetation.
- Stream channel and spring vegetation communities – at a minimum:
 - Survey all stream and spring monitoring locations.
 - Define vegetation communities at all monitoring locations.
 - Inventory map of vegetation communities at all monitoring locations.
- Stream channel and spring area threatened, endangered, candidate, and sensitive species. Survey all TEC and Sensitive species. Provide population location and individual numbers for each population.
- Stream channel and spring area vegetation community condition – at a minimum:
 - Describe condition along stream bank. Concentrate observations at all monitoring locations.
 - Describe condition at all spring locations. Concentrate observations at all monitoring locations as well as discharge sites if different from monitoring locations.
 - Provide photographs of communities along stream channel, on hillsides flanking the stream channel, and at spring locations. Take photographs at established photo points.
 - Describe effects of erosion along stream channel, on hillsides flanking the stream channel, and at spring locations. Numerically rate erosion effects. For example, 1=extreme erosion, 2=high erosion, 3=moderate erosion, 4=slight erosion, 5=no erosion.
 - Repeat vegetation community condition observations two times a year (beginning and end of growing seasons) for the first two years and the fifth year following undermining. Refer to schedule below.

- Provide two copies of the survey reports to DOGM. Include one copy in DOGM Annual Reports. The Division will provide the second copies to the Fishlake National Forest.
 - Baseline data prior to undermining: 2012 report in the 2013 Annual Report.
 - 1st year data following undermining: 2014 report in the 2015 Annual Report.
 - 2nd year data following undermining: 2015 report in the 2016 Annual Report.
 - 5th year data following undermining: 2018 report in the 2019 Annual Report.

Stream channel macroinvertebrate:

- Stream channel macroinvertebrate baseline survey. The survey must include – at a minimum:
 - Three monitoring sites.
 - Organism species and number (#/m²).
 - Contractor must use an approved survey protocol.
- Provide two copies of the survey reports and maps to DOGM. Include one copy in the DOGM Annual Reports. The Division will provide the second copy to the Fishlake National Forest.
 - Baseline data prior to undermining: 2012 report in the 2013 Annual Report.

The mine operator will implement, if necessary, a revegetation/mitigation plan as determined by DOGM in consultation with the USFS.

Cultural Resource Monitoring Plan for undermining the South Fork of Quitchupah 2R2S Block “A” panel (2012)

Monitoring Plan: (MOA #; MRP pgs 4-12 to 4-12A)

The monitoring, treatment plan and mitigation of the cultural resource sites will be in accordance with the Memorandum of Agreement (MOA), and any amendment to it, between the U.S. Forest Service, Utah State Historic Preservation Office (USHPO), and Canyon Fuel Company, LLC located in MRP Appendix 4-6.

The mine will provide two copies of an Executive Summary of monitoring results to the Division. One copy will be included in the mine’s Annual Report. The Division will provide the second copy to the Fishlake National Forest.

APPENDIX 4-6

Cultural Resource Memorandum of Agreement
Fishlake National Forest

APPENDIX 7-26

**Probable Hydrologic Consequences of Longwall Coal Mining of
2R2S Block "A" at the Canyon Fuel Company, LLC Sufco Mine,
Salina, Utah**

**Probable Hydrologic
Consequences of Longwall
Coal Mining of 2R2S
Block “A” at the Canyon
Fuel Company, LLC
Sufco Mine, Salina, Utah**

25 June 2012

Canyon Fuel Company, LLC
Sufco Mine
Salina, Utah



PETERSEN HYDROLOGIC, LLC
CONSULTANTS IN HYDROGEOLOGY

**Probable Hydrologic
Consequences of Longwall
Coal Mining of 2R2S
Block "A" at the Canyon
Fuel Company, LLC
Sufco Mine, Salina, Utah**

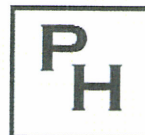
25 June 2012

Canyon Fuel Company, LLC
Sufco Mine
Salina, Utah

Prepared by:



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**Probable Hydrologic Consequences of
Longwall Coal Mining of 2R2S Block A
At the Canyon Fuel Company, LLC
Sufco Mine, Salina Utah**

1.0 Introduction

The Canyon Fuel Company, LLC Sufco Mine has been in operation since 1941. The mine is located in the southern Wasatch Plateau coal district approximately 17 miles east of Salina, Utah (Figure 1). Coal mining operations at the Sufco Mine are carried out using longwall mining techniques. Continuous mining techniques are primarily utilized to construct the development entries for the longwall panels.

Development mining for the 2R2S longwall mining panel at the Sufco Mine is currently being completed (Figure 2). As initially proposed, the 2R2S longwall panel was laid out such that a block of coal situated beneath the South Fork of Quitchupah Creek was excluded from the mining plan (identified as *Block A* of the 2R2S longwall panel). The panel is

located in Section 24, Township 21 South, Range 4 East on Federal lease UTU-63214. The Utah Division of Oil, Gas and Mining (Division) has previously approved the longwall mining at the 2R2S longwall panel with the exclusion of a stream buffer zone in the eastern half of Block A beneath the South Fork of Quitchupah Creek. (Based on the mining conditions at the site, it was determined that it would not be feasible to mine only the western half of Block A). After consultation with the U.S. Bureau of Land Management (BLM), it was proposed that the mining plan should be modified to include longwall mining of the entire 2R2S longwall panel, including all of Block A. The mining of the Block A panel was proposed to maximize the coal resource recovery (the Block A coal would likely never be recovered if not recovered with the 2R2S longwall panel) and to extend the life of the Sufco Mine. Approval was granted by the BLM to mine Block A of the 2R2S panel on 8 June 2011.

While the Probable Hydrologic Consequences of mining in the 2R2S panel (without the extraction of the eastern half of Block A) have previously been evaluated and approved by the Division as part of the approved Sufco Mine MRP, the probable hydrologic consequences relating specifically to the longwall mining of the 2R2S Block A panel beneath the South Fork of Quitchupah Creek have not been previously evaluated. The purpose of this investigation is to provide a determination of the probable hydrologic consequences (PHC) of mining Block A of the 2R2S panel at the Sufco Mine. The primary focus of this PHC determination is to evaluate the probable hydrologic consequences of the undermining and

subsidence of the South Fork of Quitchupah Creek stream channel with Block A of the 2R2S longwall panel.

2.0 Methods of Investigation

- Discharge and water quality data have been collected during monitoring activities on the South Fork of Quitchupah Creek at monitoring site Sufco 006 since 1982. Most of the historic discharge measurements reported at Sufco 006 were performed using the permanently installed 12-inch Parshall flume at the site. During periods of low flow, discharge measurements at monitoring site 006 were sometimes performed using a 90-degree v-notch weir, a 3-inch Parshall flume, or using a calibrated container and stopwatch.

A series of stream gain/loss measurements were performed on the South Fork of Quitchupah Creek by Petersen Hydrologic, LLC from 2008 to 2012.

- On 16 October 2007, the South Fork of Quitchupah Creek in Section 24, T21S, R4E, which includes the steep, sheer-walled Castlegate Sandstone portion of the drainage, was surveyed by Petersen Hydrologic personnel. The surveyed area included the region extending from the upper rim of the Castlegate Sandstone escarpment, downward through the steep, narrow canyon area, and extending to the contact with the underlying Blackhawk Formation (Figure 3). During this site visit, discharge

measurements on the creek were performed and the lower canyon area was surveyed for the presence of springs. Discharge measurements were performed using a calibrated container and stopwatch. The entire discharge in the creek was diverted through a length of pipe and directed into the calibrated container. Time-to-fill measurements were repeatedly performed at each monitoring site, and an average of all values was used to calculate the discharge rate. These measurements are considered to be accurate to within about 1 to 2 percent.

- On 4 September 2009, a stream survey of the South Fork of Quitupah Creek was performed by Petersen Hydrologic personnel from near its headwater area along the base of the White Mountain cliffs to the contact with the upper rim of the Castlegate Sandstone escarpment. Six discharge measurements were performed over this approximately 3 mile reach of the stream (Figure 4). These discharge measurements were performed using a Marsh-McBirney Model 2000 electromagnetic type current velocity meter with wading rod. Measurements performed using this technique are typically considered to be accurate to within about 5 to 10 percent.
- On 12 October 2009, a series of high-accuracy discharge measurements were performed in Sections 23 and 24, T21S, R4E near proposed coal mining areas under baseflow conditions (Figure 5). These measurements were performed by Petersen Hydrologic personnel using a 90-degree v-notch weir. Stream locations where near-ideal measuring conditions were present were selected for monitoring. The

measurements reported for this investigation are believed to be accurate to within about 1 to 2 percent.

- On 17 June 2011, 21 September 2011, 12 October 2011, and on 1 June 2012, discharge measurements were performed on each occasion at three locations on the South Fork of Quitchupah Creek (Figure 6). These included site Sufco 006A, which is an established baseline monitoring site upstream of the 2R2S longwall panel area, site Sufco 006B, which is an established baseline monitoring site within Block A near the geologic contact between the Price River Formation and the underlying Castlegate Sandstone, and site Sufco 006C, which is located within the sheer-walled, deeply incised portion of the canyon downstream of the 2R2S panel area (which is situated near the contact between the Castlegate Sandstone and the underlying Blackhawk Formation). These stream gain/loss measurement activities were performed during high-flow and low-flow conditions, and during a period of drought (2012) and a period of extreme wetness (2011).
- The topography of the stream channel of the South Fork of Quitchupah Creek in Section 24, T21S, R4E, was surveyed by Sufco Mine personnel. The stream channel topographic profile was plotted electronically using AutoCAD software.
- A sediment permeability study was performed on the near-surface sediments adjacent to the stream channel along the South Fork of Quitchupah Creek by Jones and

DeMille Engineering, Inc. of Richfield, Utah during November 2010. Field-saturated hydraulic conductivity measurements were performed using a single ring infiltrometer. Additionally, sediment samples were collected for laboratory analysis of Atterberg Limits (liquid limit LL and plasticity index PI) and the classifications of the soils.

- The Sufco Mine workings in the 2R2S and adjacent areas were visited during late 2011 and early 2012. During these visits, samples for solute and isotopic analysis were collected. Tritium analyses were performed by the University of Miami Tritium Laboratory of Miami, Florida.

3.0 Climate

Climatic conditions in the Utah Region 4 area have varied substantially during the period of baseline monitoring in the South Fork area. This is illustrated in a plot of the Palmer Hydrologic Drought Index (PHDI) for Utah Region 4 (Figure 7). The PHDI is a monthly value generated by the National Climatic Data Center using a variety of hydrologic parameters that indicates the severity of wet and dry spells. The PHDI is calculated from several hydrologic parameters including precipitation, temperature, evapotranspiration, soil water recharge, soil water loss, and runoff. Consequently, it is a useful tool for evaluating the relationship between climate and groundwater and surface water discharge data. It is apparent in Figure 7 that beginning in the early 1980s the region began a transition from a period of drought to a period of extreme wetness that peaked during 1983 and 1984.

Subsequent to this period of extreme wetness, the region began an essentially continuous period of drying, peaking with a period of extreme drought in 1990. This period of drought persisted through 1992, when the region transitioned to a period characterized by alternating wet and dry spells that persisted through the end of 1996. Beginning in early 1997, the region transitioned into a three-year period of moderate to extreme wetness. Beginning in 2000, the region transitioned into a period of dryness that persisted approximately 4 years, followed by a brief period of extreme wetness that peaked during the spring of 2005. During 2006 the region transitioned into a period characterized primarily by mild to moderate drought that persisted until early 2010. Beginning in early 2010 the region began a transition to a period of severe to extreme wetness that peaked in mid-2011. Starting in mid-2011, the region began a rapid transition towards dryer climatic conditions. As of May of 2012 the region was experiencing drought conditions.

4.0 Geology

Four Cretaceous- to Tertiary-age bedrock formations crop out in the South Fork of Quitchupah Creek area (Figure 2). These include, in descending order, the North Horn Formation, Price River Formation, Castlegate Sandstone, and the Blackhawk Formation. These geologic formations are shown on a geologic map in Figure 2. Each of these formations, and their water bearing and transmitting potential, is described briefly below.

North Horn Formation

The North Horn Formation consists of variegated (mainly shades of red) shales with minor sandstone, conglomerate, and freshwater limestone (Doelling, 1972). It is estimated to be about 1,490 feet thick in the study area, although no drilling in the area has penetrated both the upper and lower contacts of the formation. The lower contact of the formation is transitional with the underlying Price River Formation. The formation is vulnerable to mass movement, slope failures, and landslides (USFS, 2005). The North Horn Formation is present at the surface in the higher elevation regions surrounding the 2R2S panel area (Figure 2).

Because of the pervasiveness of low-permeability shale horizons in the North Horn Formation, vertical migration of groundwater through the formation is limited. Consequently, groundwater flow in the North Horn Formation occurs primarily through fractured or shallow weathered zones, or locally through sandstone paleochannels. For these reasons, groundwater recharge through the North Horn Formation to the underlying Price River Formation is likely not appreciable.

Price River Formation

The Price River Formation forms low-lying hills on the plateau in the South Fork area (Figure 2). The Price River Formation is present at the land surface over most of the 2R2S longwall panel. The formation is reported to be approximately 550 feet thick in the Sufco permit area. The Price River Formation consists of gray to white gritty sandstone

interbedded with shale and conglomerate deposited in a fluvial environment. The Price River Formation typically forms ledges and slopes due to the interbedding of resistant sandstones with less resistant shales and claystones.

While individual fluvial sandstones in the Price River Formation are capable of transmitting water, water is typically not transmitted over great vertical or horizontal distances in the formation. This is because of the lenticular geometry of the sandstone units and the interbedded low-permeability shales and claystone layers present in the formation. The springs which discharge from the Price River Formation in the study area appear to discharge from fractured bedrock units where these units intersect the land surface and are underlain by low-permeability strata within the formation. Because of the presence of interbedded low-permeability strata within the formation, the flow of groundwater within the Price River Formation likely occurs primarily as lateral flow within individual fractured sandstone members. Vertical migration of groundwater within the formation is likely minimal. The presence of the Price River Formation over most of the study area greatly limits the potential for groundwater recharge to underlying strata.

Soils and near-surface unconsolidated sediments derived largely from the Price River Formation in the 2R2S panel area consist largely of clays that are of very low permeability (Appendix C).

Castlegate Sandstone

The Castlegate Sandstone is a cliff-forming unit that comprises the rim rocks of the deeply incised South Fork of Quitchupah Creek canyon. The Castlegate Sandstone is disconformably overlain by the Price River Formation. The Castlegate Sandstone, which is about 200 feet thick in the study and adjacent area, is predominately massively-bedded, coarse-grained sandstone with some interbeds of shale, siltstone, and conglomerate. Pervasive silica and carbonate cement makes the formation well indurated and brittle. The Castlegate Sandstone was formed in a braided fluvial depositional system.

Although some of the sandstone rocks in the Castlegate are sufficiently permeable to transmit appreciable groundwater, groundwater flow through the pore spaces in the formation is limited. This is due primarily to the presence of mudstone drapes and bounding layers that are interbedded with the sandstone units in the formation. Near-vertical jointing in the Castlegate Sandstone is pervasive and readily observable where the formation is exposed in the steep-walled lower portions of the South Fork. In the greater Sufco Mine area, it has been observed that groundwater flow occurs locally along bedding plains where permeable strata are underlain by the thin clay or shale perching layers that exist locally in the formation. The direction of bedding plain groundwater flow in the area is controlled by the local dip of the stratigraphic bedding horizons (which is generally toward the north-northwest). Because of the discontinuous nature of the shale layers, and the fact that permeable sandstone strata are not continuous over significant distances, long, regional-type

flow systems generally do not develop in the Castlegate Sandstone. Rather, Castlegate Sandstone groundwater systems, where they exist, are typically local in nature with small to moderate quantities of groundwater discharged.

Where the Price River Formation, which generally does not support vertical migration of fluids, is present above the Castlegate Sandstone, the potential for recharge to the Castlegate Sandstone is minimal. Consequently, recharge to the Castlegate Sandstone commonly occurs where the formation is directly exposed at the surface, or where it is covered only by a thin covering of sandy sediments. The Castlegate Sandstone is underlain by the Blackhawk Formation, which acts as a basal confining layer, preventing appreciable vertical migration of groundwater from the unit into deeper strata.

Blackhawk Formation

The Blackhawk Formation in the study area consists predominantly of lenticular, discontinuous beds of sandstone, siltstone, mudstone, shale, and coal. The coal to be mined in the 2R2S panel is present in the Upper Hiawatha Coal seam in the lower portion of the Blackhawk Formation. The Upper Hiawatha Coal seam is underlain in the region by a sequence of shaley lagoonal deposits, ranging in thickness from 2 to 29 feet, which include the Lower Hiawatha Coal Seam (Mayo and Associates, 1997). In the study area, the upper 500 feet of the formation generally has massive, fine- to medium-grained, cliff-forming sandstone units (Thiros and Cordy, 1991). The number and thicknesses of sandstone units decreases toward the base of the unit. The lower 300 feet of the formation contains thinly-

bedded sandstone and shale. The thickness of the Blackhawk Formation in the study and adjacent area is about 800 feet.

Because of the presence of interbedded low-permeability units in the Blackhawk Formation and the vertical and lateral discontinuity of sandstone horizons, the potential for vertical and horizontal movement of groundwater is limited. For this reason, groundwater flow in the formation occurs primarily through sandstone paleochannels, or occasionally through faults and fractures, while migration of groundwater across geologic formations (either vertically or horizontally) is limited. The direction of groundwater flow within permeable sandstone channels is largely constrained by the geometry of the sinuous channel structures and also by the structural dip of the strata. Because of the lenticular nature of the permeable strata in the Blackhawk Formation (both at a micro and macro scale), and due to the fact that individual sandstone channels often interpenetrate and are truncated, regional type groundwater flow regimes typically do not form within the Blackhawk Formation in the Sufco Mine area.

The Blackhawk Formation is known to contain swelling clays that tend to naturally heal mining-induced fractures in the formation. Well drilling reports and laboratory analysis of samples indicate that the claystone layers in the Blackhawk Formation contain swelling clays which plastically deform when fractured (Mayo and Associates, 1997). Chempet Research Corporation (1989) found that Blackhawk Formation claystone layers contain up to 58% montmorillonite.

Structure

Major faulting has not been identified in the 2R2S panel area. However, small displacement faults (apparent vertical displacement of about three feet or less) and some of greater displacement have been encountered in various locations within the SUFCO mine. These faults most commonly strike approximately N10° to 15°W and are inclined nearly vertical. Joints are both parallel and normal to the fault trend. Both minor faults and joints may exist in the South Fork area. Joints in the Castlegate Sandstone are common. The surface traces of these joints are up to approximately 1,000 feet in length and are spaced about 16 to 33 feet apart. The primary fracture orientation in the Sufco Mine area is approximately N 26° W, with a secondary set of fractures oriented about N 65° E also being measured (Thiros and Cordy, 1991).

Rock units in the study area strike roughly 40°E and dip 1 to 2° (about 250 feet per mile) to the northwest. Local dips of the coal seam may range up to 10 degrees in areas where underlying paleochannels caused significant differential compaction.

5.0 Presentation of Data

The location of the 2R2S Block A and adjacent mine workings are shown on a geologic map on Figure 2. Baseline monitoring site details for springs and streams are provided in Table 1. Locations of spring and stream monitoring stations are shown on Figure 6. The geologic

formations present in the South Fork of Quitchupah Creek stream channel substrate are shown on Figure 8. The discharge data collected at the South Fork of Quitchupah Creek during the Petersen Hydrologic 2009-2012 field investigations are presented in Table 2. Historic discharge and water quality data collected at the South Fork of Quitchupah Creek from 1982-2012 are presented in Table 3. Discharge and water quality data from springs, seeps and additional monitoring sites on the South Fork are also shown on Table 3. The results of tritium analyses from groundwater samples from the underground Sufco Mine workings in the vicinity of the 2R2S panel are presented in Table 4. Baseline water quality information from springs, seeps, and from the South Fork is also provided in Appendix A. Isotopic laboratory reporting sheets are presented in Appendix B. The results of the Jones and DeMille soil permeability investigation are presented in Appendix C.

A discharge hydrograph for the South Fork of Quitchupah Creek as monitored at the Sufco 006 monitoring station for the period 1982-2012 is presented together with a plot of the Palmer Hydrologic Drought Index (PHDI) in Figure 7. The PHDI is a numerical value generated monthly by the National Climatic Data Center (NCDC) that indicates the severity of wet and dry spells (NCDC, 2010). Monitoring site locations for the October 2007, September 2009, and October 2009 field investigations are shown on Figures 3, 4, and 5, respectively. The results of the gain/loss measurements performed on the South Fork of Quitchupah Creek during 2011 and 2012 are plotted in Figures 9, 10, 11, and 12. Discharge hydrographs for 006A spring and for Roberts Spring are presented in Figures 13 and 14. A map showing the geologic formations present in the South Fork of Quitchupah Creek stream

substrate is presented in Figure 8. A plot of TDS concentrations versus discharge rates in the South Fork of Quitchupah Creek is presented in Figure 15. A plot of the longitudinal topographic profile of the South Fork of Quitchupah Creek stream channel in Section 24, T21S, R4E is provided in Plate 1. Stream gradients in any selected reaches of the stream may be calculated using the information provided in Plate 1.

6.0 Groundwater and Surface Water Systems

The South Fork of Quitchupah Creek is a mountain stream that drains portions of the Canyon Fuel Company, LLC Sufco Mine permit area. Monitoring of discharge rates and water quality in the stream has been routinely performed since the early 1980s as part of Sufco Mine's quarterly water monitoring program. During 2007 - 2012, supplemental monitoring activities were performed in selected reaches of the South Fork of Quitchupah Creek. Additionally, the topography of the South Fork stream channel was surveyed during 2010 and a stream channel profile was created.

Historically, discharge measured in the South Fork of Quitchupah Creek has ranged from no flow during low-flow conditions during a period of drought in 2001 to 1,116 gpm during the high-flow period of an extreme wet spell in 2011. Flows of about 1 gpm or less have been measured in the creek (at Sufco 006) on seven occasions during six different years, demonstrating a lack of a substantial drought-resistant component of baseflow discharge in the drainage.

It should be noted that a crude, undeveloped surface diversion on the South Fork of Quitchupah Creek that diverts surface water to the Skumpah drainage is present in the south-central portion of Section 15, T21S, R4E (Figure 4). Historical information on the magnitude of water diverted from the South Fork to Skumpah Creek at this location is not available. When the drainage was surveyed on 4 September 2009, a flow of 29 gpm was being diverted, which represents approximately 13% of the total flow (relative to the 215 gpm measured upstream at SFQ-5). Additionally, a United States Forest Service diversion for stock watering use is present at monitoring site SFQ-5 (Figure 4).

Discharge measured at Sufco 006 is a function of seasonal and climatic variability. Yearly discharge peaks are readily apparent in the discharge hydrograph for the South Fork (Figure 16). The yearly discharge peaks typically occur during the second quarter monitoring event (usually in May or June) in response to the annual snowmelt event. The minimum flow monitored during a year typically occurs during the 4th quarter monitoring event (usually in October or November) as seasonal water is gradually drained over the summer and fall months.

The peak and baseflow discharge rates in the South Fork increased markedly in response to significantly wet periods that occurred in the early 1980s, the late 1990s, and the mid 2000s (Figure 16). Peak and baseflow discharge rates were low in the creek during the early 1990s

and early 2000s in response to regional drought conditions that prevailed during these times (Figure 16).

It is apparent from the results of the September 2009 monitoring activities that discharge in the South Fork of Quitchupah Creek was at a maximum in the upland areas within the North Horn Formation (Monitoring sites SFQ-4 and SFQ-5). Lower discharge rates were observed in the lower reaches of the South Fork where the stream flows over the Price River Formation. These losses are most likely attributable to exchange of groundwater between the stream and the permeable alluvial sediments underlying portions of the stream channel and to losses of surface water to evapotranspiration during the warm early-September day on which the monitoring was performed.

A series of high-accuracy discharge measurements were performed on 12 October 2009 in the South Fork of Quitchupah Creek in areas proposed for mining (Sections 23 and 24, T21S, R4E; Figure 5). The monitoring occurred in portions of the stream underlain by the Price River Formation (from its upper portion downstream to the contact with the underlying Castlegate Sandstone). It is apparent from the discharge data in Table 2 that gains in stream flow do not occur in this portion of the South Fork of Quitchupah Creek. Rather it is apparent from the October 2009 data and from subsequent monitoring at stations 006A and 006B that discharge rates in the creek typically decline marginally over this reach (Tables 2 and 3). During the high-flow period in June 2010, the discharge decreased from 500 gpm at Sufco 006A to 433 gpm at Sufco 006B, which represents a decrease of about 13%. During

the low-flow period in October 2009, this discharge decreased from 75 gpm at Sufco 006A to 65 gpm at Sufco 006B, which represents a decrease of about 13% between these two monitoring stations. This information suggests that there is no measurable groundwater baseflow contribution to discharge in the South Fork over this reach of the stream in the Price River Formation. The observed modest declines in discharge over this reach are likely attributable to interactions with the adjacent stream alluvium and to losses to evapotranspiration. Consumption of stream water by numerous cattle present in the area at the time of the monitoring may possibly also have marginally diminished the flow in the stream.

Mayo et al. (2003) presented a conceptual model of groundwater flow that describes active and inactive flow regimes in stratified mountainous terrains. This model was developed based on an analysis of solute, isotopic, and hydrographic data from a large number of springs and in-mine sampling locations in the Wasatch Plateau and Book Cliffs coal fields of Utah as well as western Colorado. The model is based on an analysis of interactions between surface waters and shallow and deep groundwater systems.

As defined by Mayo et al. (2003) active-zone groundwater flowpaths are continuous, responsive to annual recharge and climatic variability, and have groundwater ages that become progressively older from recharge to discharge areas. Springs discharging from active-zone groundwater systems contain appreciable ^3H (tritium) and anthropogenic ^{14}C .

Inactive-zone groundwater systems have extremely limited or no communication with annual

recharge and have groundwater mean residence times that do not progressively increase along the flow path. Groundwaters in the inactive-zone may be partitioned, occur as discrete bodies, and may occur in hydraulically isolated regions that do not have hydraulic communication with each other. Inactive-zone groundwaters typically have no ^3H and have mean residence times (groundwater "ages") of 500 to 20,000 years. Inactive-zone groundwater systems commonly occur where the depth of cover is less than about 250 to 500 feet and extend into cliff-faces for a distance of about 500 to 1,000 feet. Under deeper cover and further from cliff faces, inactive-zone groundwater systems are commonly present. Inactive-zone groundwater systems are commonly encountered in Utah underground coal mine environments (away from cliff faces and under considerable bedrock overburden thicknesses).

Two spring areas have been identified in the South Fork canyon between Sufco 006A and Sufco 006C. These include 006A spring, which discharges at less than 0.5 gpm from the Price River Formation west of the 2R2S panel area, and the Roberts Spring complex, which consists of Roberts Spring (which discharges at less than 0.5 gpm from the Price River Formation just west of the 2R2S panel area) and springs RS-A and RS-B, which seep at low rates just east of Roberts Spring. Discharge hydrographs for these springs are presented in Figures 13 and 14. It is noteworthy that no appreciable springs were identified in the Price River Formation adjacent to the stream between monitoring points Sufco 006A and Sufco 006B (Figure 6). An area of minor bank seepage was also observed east of Roberts Spring

adjacent to the South Fork stream channel. No springs were observed in the Castlegate Sandstone or upper Blackhawk Formation in the 2R2S panel area.

It is apparent in Figures 13 and 14 that these Price River Formation springs respond to climatic variability, suggesting that these springs are associated with active-zone groundwater systems. Responses to seasonal variability at these springs are less apparent.

When the South Fork of Quitchupah Creek in Section 24, T21S, R4E, which includes the steep, sheer-walled Castlegate Sandstone portion of the drainage, was surveyed in October 2007, only minimal surface-water flows were present (the monitoring occurred during a period of regional drought). The discharge was measured in three locations in the canyon. These include a measurement at the upper rim of the Castlegate Sandstone escarpment (8.11 gpm), a measurement in the middle section of the Castlegate Sandstone (5.90 gpm), and a measurement near the base of the Castlegate Sandstone at the Blackhawk Formation contact (6.10 gpm). It is apparent from these data that the stream did not gain any appreciable water as it flowed over the Castlegate Sandstone. Rather, the discharge rate measured near the base of the formation was about 2 gpm less than that measured at the top of the formation. The observed minor decrease in flow in the South Fork in this reach is most likely attributable to evapotranspiration loss and/or infiltration of minor amounts of water into the Castlegate Sandstone bedrock or alluvial deposits.

During the October 2007 visit, no springs in the Castlegate Sandstone or upper Blackhawk Formation were identified in that section of the canyon. Some zones of moderately increased soil moisture with increased vegetation were observed on north-facing slopes within the steep-walled portion of the canyon. However, no water was observed at these locations, nor were there any obvious indications of water recently being present at these locations.

Surface waters in the South Fork of Quitchupah Creek as monitored at Sufco 006 are generally of the no-dominant cation – bicarbonate geochemical type. Sodium, Calcium, and Magnesium are all present in appreciable quantities. TDS concentrations average approximately 435 mg/L and have historically ranged from a low of 269 mg/L during June of 1988 to a high of 850 mg/L during August 1984. The variability in the TDS concentrations of surface waters in the South Fork is likely attributable to 1) diluting effects of seasonal low-TDS snowmelt waters, and 2) the dissolution of soluble minerals commonly known to occur in the Price River Formation (Petersen Hydrologic, 2010).

The TDS concentrations of South Fork stream waters are plotted against stream discharge rates in Figure 15. It is apparent from Figure 15 that the highest TDS values occur during periods of low flow. The lower- and middle-range TDS values do not appear to correlate with stream discharge rates. It is likely that the highest observed TDS values may be attributable to a low water/rock ratio (which maximizes the effects of mineral dissolution), or perhaps to the effects of evapoconcentration during low-flow periods.

It is apparent in the water quality data for monitoring sites Sufco 006A and Sufco 006B (Table 3) that the specific conductance of the water consistently increases moderately between the upstream (006A) and downstream (006B) monitoring sites. This observed increase in specific conductance is consistent with the dissolution of soluble minerals in the Price River Formation in the stream bed over this distance. It should also be noted that the area between Sufco 006A and Sufco 006B is used frequently by livestock. The livestock activity in and near the creek could potentially result in some degradation of water quality over this reach. Little change in water quality was observed between monitoring sites 006B and 006C (See Table 3).

A gain/loss investigation of the South Fork of Quitcupah Creek was performed on 1 June 2012. At the time of this survey, discharge in the South Fork was essentially absent. The absence of flow was likely attributable to the combination of the effects of the prevailing drought conditions, and also to likely diversions of water at up-gradient locations. Because of the lack of water in the stream channel at that time, observations of areas potentially contributing baseflow to the stream channel could readily be observed. It was noted during that survey that a meager discharge of less than 1 gpm was present at monitoring site 006A. Discharges of less than 1 gpm were intermittently present in the reach between 006A and 006B (which was considered likely to represent the re-emergence of water originating at upstream locations as alluvial seepage into the creek where it was forced to the surface as a result of the alluvial geometry). No discharge was present in the stream in the reach between monitoring sites 006B and 006C. This observation is significant, because it indicates that

there are apparently no appreciable sources of groundwater-derived baseflow to the stream in the 2R2S panel area (between monitoring sites Sufco 006A and Sufco 006C).

The surveyed profile of the stream channel of the South Fork of Quitcupah Creek underlying and adjacent to the 2R2S longwall mining area is shown in Plate 1. The profile extends from near the upper (western) margin of the longwall panel downstream to a location beyond where the stream channel crosses the northern edge of the projected longwall panel area (Plate 1). The overall channel gradient over the area surveyed (from location A to A') is approximately 0.058 (5.8%), with a change of approximately 230 feet of elevation over about 3,980 linear feet of stream channel. Stream gradients in the western portion of the surveyed profile, where the stream channel is developed on the Price River Formation or associated alluvial sediments, range from about 0.020 to 0.030, generally steepening to the east. Stream gradients in the eastern portion of the surveyed profile are generally steeper but less uniform due to the presence of ledges and cliffs of the resistant Castlegate Sandstone in the stream substrate. Channel gradients in the eastern portion vary from near vertical in the cliff and ledge areas, to about 0.066 in the easternmost portion of the surveyed profile.

7.0 Determination of Probable Hydrologic Consequences

As part of the previous permitting actions, the Probable Hydrologic Consequences of coal mining in the South Fork of Quitchupah Creek area have been analyzed and reviewed by the Division. The following section presents the specific determination of Probable Hydrologic Consequences of Coal Mining associated with the undermining of the South Fork of Quitchupah Creek with the 2R2S panel at the Sufco Mine.

728.100 Quality and quantity of surface water and groundwater under seasonal flow conditions

Information on the quantity and quality of surface-water and groundwater under seasonal flow conditions in the 2R2S Block A and surrounding areas is presented in Table 3.

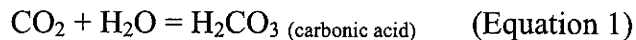
Additional information on groundwater and surface-water quality and quantity in and around the 2R2S Block A area has been submitted electronically to the Utah Division of Oil, Gas and Mining through the on-line coal water quality database, which is freely accessible and located at: <http://ogm.utah.gov/coal/edi/wqdb.htm>.

Stiff diagrams depicting the solute chemical composition of groundwaters and surface waters in the 2R2S panel area are shown on Figure 6. Stiff diagrams are a useful analytical tool that allows the graphical representation of groundwater and surface-water solute compositions.

The shape of the Stiff diagram is a reflection of the geochemical type of the water, while the size of the diagram is related to the total dissolved solids concentration of the water.

Groundwaters and surface waters in the South Fork of Quitchupah Creek drainage commonly acquire their solute compositions through a series of well-documented chemical reactions. These are briefly summarized below.

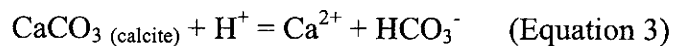
Carbon dioxide gas is produced naturally in the soil at concentrations greatly exceeding atmospheric concentrations by root-zone respiration and also by the decay of organic matter. Recharge water (rain and snow melt), upon entering the soil mantle, reacts with CO_2 to produce carbonic acid according to:



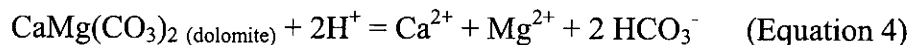
The produced carbonic acid subsequently dissociates into hydrogen ions (acid) and bicarbonate according to:



The H^+ produced from Equation 2 reacts with carbonate minerals pervasive in the rocks of the Wasatch Plateau coal field yielding calcium and magnesium ions and additional bicarbonate ions to the water according to:

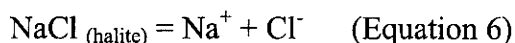
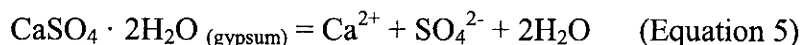


and

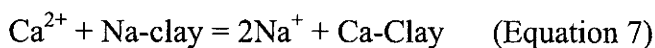


Because of the limited solubility of calcite and dolomite in the absence of an additional source of CO₂, waters acquiring their solute compositions through the geochemical evolutionary pathway described in Equations 1 through 4 typically have relatively low TDS concentrations.

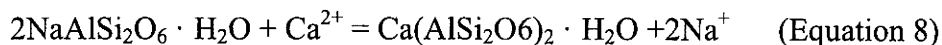
Groundwaters from formations containing soluble evaporite minerals often acquire a different solute geochemical type and dissolved solids concentrations appreciably greater than that typically resulting from geochemical evolutionary pathway as described by equations 1-4 above. Surface waters flowing over sediments containing soluble evaporite minerals may also acquire elevated TDS concentrations and changed solute geochemical type. The geochemical reactions often responsible for these changes in chemical composition include:



Waters rich in Ca²⁺ resulting from the dissolution of gypsum (Equation 5) may undergo ion exchange on clay minerals resulting in an increase in Na⁺ concentrations at the expense of exchanged Ca²⁺ ions according to:



Ion exchange may also occur on zeolite minerals such as the sodium zeolite analcime according to:



Stiff diagrams graphically depicting the solute chemical compositions of groundwaters and surface-waters in the South Fork of Quitichupah Creek (2R2S panel area) are presented in Figure 6.

The chemical compositions of groundwater discharging from springs and surface waters in streams in and around the 2R2S Block A area are presented in Table 3. Discharge hydrographs for springs are presented in Figures 13 and 14. A discharge hydrograph for the South Fork of Quitichupah Creek as monitored at site Sufco 006 is presented in Figure 16.

All of the springs identified in the 2R2S panel area discharge from the Price River Formation. The chemical compositions of these springs are depicted graphically as Stiff diagrams in Figure 6. The TDS concentrations of these springs range from 658 to 974 mg/L (Table 3), which is typical for springs discharging from the Price River Formation. The groundwaters are variable in chemical type. The dominant anion for each of the three springs is bicarbonate, with appreciable sulfate also being present. The dominant cation for each of the three springs is sodium, with lesser amounts of calcium and magnesium also being present (See Table 3 and Figure 6). The pH levels for the spring groundwaters are all near-neutral to moderately alkaline, ranging from 7.17 to 7.83. The discharge rates from these springs are modest. The historical discharge rates measured at these springs have not exceeded 0.44 gpm.

The chemical composition of surface waters flowing in the South Fork of Quitchupah Creek have exhibited considerable variability over the period of monitoring, with TDS concentrations ranging from 269 to 850 mg/L. As shown on Figure 15, although a strong correlation is not present, the greatest TDS concentrations are often associated with periods of low flow, while the lower TDS concentrations are often associated with periods of moderate or high flow. The solute compositions of surface waters during baseflow conditions (October 2011) in the South Fork of Quitchupah Creek are depicted graphically as Stiff diagrams in Figure 6. It is evident in Figure 6 and Table 3 that the South Fork waters are of the calcium-magnesium bicarbonate chemical type. Sulfate concentrations are also appreciable in these surface waters.

Discharge of groundwater from the Blackhawk Formation to springs has not been observed in the 2R2S panel area. However, inactive-zone groundwater from the Blackhawk Formation is routinely encountered in the underground Sufco Mine workings. Historically, discharge from the Blackhawk Formation within the Sufco Mine underground workings does not show seasonal variability in discharge rate. Rather, discharge from Blackhawk Formation sandstone paleochannels in the mine workings is typically short-lived, with discharge rates declining rapidly after first being encountered (Personal communication, Mark Bunnell, 2011). In some areas of the mine, more sustained groundwater discharges have occurred. This is consistent with the inactive-zone origins of the ancient water in the Blackhawk Formation and demonstrates the hydraulic isolation of these waters from shallow, seasonal recharge sources. A further characterization of groundwater quantity and quality in

the Blackhawk Formation within the Sufco Mine is presented by Mayo and Associates (1997, 1999).

It is noteworthy that the TDS concentrations of the three sampled in-mine groundwaters (which average about 360 mg/L) are much lower than the average TDS concentrations of springs in the Price River Formation (averaging about 658 mg/L). This strongly suggests that the groundwaters encountered in the underground mine workings in the 2R2S panel area are *not* recharged via downward migration of groundwater through the Price River Formation (as there is no plausible geochemical evolutionary pathway that would reduce the TDS of the groundwater were it to migrate downward through the Price River Formation toward the Blackhawk Formation).

728.200 Baseline hydrologic information

Spring and seep inventories have been conducted previously in the South Fork area in conjunction with the previous permitting actions at the Sufco Mine. As part of this investigation, supplemental monitoring of springs, seeps and streams has been performed by Petersen Hydrologic, LLC. In conjunction with the baseline monitoring activities, groundwater and surface-water discharge rates and field water- quality parameters, including water temperature, pH, specific conductivity, and dissolved oxygen were measured. Additional monitoring of springs, streams, and wells was performed previously by the United States Geologic Survey (Thiros and Cordy, 1991) as part of a hydrologic reconnaissance of the Quitcupah and Pines areas. The results of the baseline monitoring activities at the 2R2S

panel area are presented in Table 3. Additional baseline hydrologic data for the South Fork area have been submitted electronically to the Division of Oil, Gas and Mining Coal Water Quality Database, which are available on line at: <http://ogm.utah.gov/coal/edi/wqdb.htm>.

728.310 Whether adverse impacts may occur to the hydrologic balance

The hydrologic balance is the sum of the flow interactions between surface waters and groundwaters and between various groundwater flow systems. This section describes the potential for adverse impacts to the hydrologic balance as a result of coal mining activities beneath the South Fork of Quitcupah Creek in the 2R2S panel area.

For reasons described in previous sections of this report (Mayo and others, 2003; Mayo and Associates, 1997), the potential for the establishment of hydrodynamic communication between the shallow, active-zone groundwater systems that support spring and seep discharges in the 2R2S panel area and the deep, inactive-zone groundwater systems that will likely be encountered in the underground mine workings of the Sufco Mine is considered remote. Accordingly, while the deep inactive-zone groundwaters held primarily in sandstone paleochannels immediately overlying the mined coal seam will be dewatered through mining activities, it is considered highly unlikely that surface waters or shallow groundwaters could migrate from the near surface into the underlying mine workings where the depth of cover exceeds several hundred feet (which includes all proposed mining areas in the 2R2S panel).

Active-zone groundwater systems in near-surface sediments and strata in the Price River and North Horn Formations, where overburden thicknesses are greater than about 600 feet should not be impacted by mining operations. This conclusion is based on the following lines of evidence:

- 1) The Price River and North Horn Formations are known to contain abundant and relatively thick shale and claystone layers. These low-permeability layers inhibit the vertical migration of groundwater into deeper strata. Additionally, the Mesa Verde Group shales and claystones in the region are known to contain hydrophyllic clays which are of low permeability and swell when wetted to effectively seal subsidence cracking.
- 2) In order to estimate the height overlying mining areas to which subsidence-induced fracturing may extend, and to project minimum overburden thickness required to protect hydrologic resources, the Society for Mining, Metallurgy, and Exploration (SME, 2011) has developed empirical relationships between the thickness of the extracted coal seam and the upward fracture propagation distances (see Chapter 10.6, "Mine Subsidence"). Utilizing these relationships, the Mining Engineers Handbook recommends that a minimum vertical distance between the mine and an overlying water body with the potential for causing catastrophic damage should be a minimum of 60 times the coal mining height. The same minimum vertical separation distance is recommended for protection of aquifers overlying total extraction mining areas. Using this relationship, and estimating a mining height of 10 feet, it

would be recommended that an overburden thickness of 600 feet be present to protect critical water bodies and aquifers overlying areas of total extraction mining.

- 3) While surface cracking in these formations, which typically extend less than about 50 feet below the land surface (SME, 2011), can occur as a result of subsidence, the presence of uncompromised shale or claystone layers beneath the subsidence cracked zone prevents further downward migration of groundwater into deeper formations. Additionally, unconsolidated soils and weathered shales and clays are known to be present in North Horn- and Price River-derived sediments regionally. In areas where these formations are present near the surface and where tension cracking may occur, the tension cracks would likely remain open for only short periods of time. This is because the weathered or unconsolidated clayey or shaley sediments derived from these formations are typically plastic in nature and of low-permeability (See Appendix C). These materials, through infilling or in-place swelling, tend to rapidly heal all but the largest tension cracks, minimizing impacts to local groundwater flow regimes. That this is the case is supported by decades of previous experience in the Wasatch Plateau and Book Cliffs coal districts of Utah, where many springs discharging from these formations have been undermined without perceptible or quantifiable impacts occurring to groundwater and surface-water quality or quantity.

It should be noted that, while the downward migration of shallow groundwater into deeper geologic formations is unlikely to occur, the potential exists for the moving of groundwater discharge locations at the surface. Occasionally, where near-surface tension cracking is extensive, spring discharge locations may be moved to locations topographically lower than the original spring discharge location. For example, if a low-permeability perching layer upon which groundwater was flowing toward a spring were to be compromised as a result of extensive tension cracking, the discharge previously flowing to the spring could be rerouted through the fractured perching layer downward until a lower, uncompromised perching layer was present. Under this scenario, the post-mining discharge location for the spring would likely occur where the lower perching layer first intersected the ground surface in a down-dip location.

Mine workings in the 2R2S panel will likely intercept primarily ancient, perched groundwater systems in sandstone channels in the mine roof. Samples of groundwaters intercepted in the 2R2S panel and other nearby development entries were collected in the underground Sufco Mine workings. Tritium analysis was performed on these samples. The lack of tritium in these groundwaters (See Table 4) indicates that the groundwaters have been isolated from the land surface or shallow recharge sources for at least the past 50 years. Mining operations will dewater the ancient, perched groundwater systems. However, because these systems are not in good hydraulic communication with the ground surface or shallow overlying active-zone groundwater systems, dewatering of the deep, perched systems will likely have no impact on overlying groundwater or surface water regimes.

As discussed previously, inactive-zone groundwater systems in the Blackhawk Formation occur in isolated partitions that are not in good hydraulic communication with the land surface or shallow, overlying active-zone groundwater systems that support springs and seeps. Therefore, it is likely that groundwater that will be intercepted in the Blackhawk Formation in the 2R2S panel area will be groundwater being removed from storage. Because inactive-zone groundwater systems are not in hydraulic communication with the land surface or shallow, active-zone groundwater systems, groundwater being removed from the Blackhawk Formation is likely not being replenished by recharge from adjacent or overlying groundwater systems or from infiltration of surface waters at any appreciable rate.

At any underground longwall coal mine, interruption and deformation of strata above longwall-mined areas has the potential to alter pre-mining groundwater flow conditions. The potential for this impact to occur in the 2R2S panel area is considered minimal. Rock mechanics equations have been developed that predict the height to which bedrock fracturing will likely extend above areas subsided by coal mines. In western coal mines, it is estimated that subsidence fractures commonly propagate upward approximately 30 times the height of the extracted coal (Kadnuck, 1994). Other researchers have estimated the maximum height of upward propagation of fracturing at 60 times the height of the extracted coal (SME, 2011). Assuming a mining thickness of 10 feet, it would be anticipated that fracturing would extend upward for a distance of approximately 300 to 600 feet. Above this height, rock strata tend to flex rather than fracture, and no appreciable increase in vertical hydraulic conductivity is

anticipated. Differential ground subsidence can also result in the formation of tension cracks at the land surface, particularly above abutments, longwall panel ends, and longwall gate roads. Previous experience at the Sufco Mine and information provided by SME (2011) indicates that these fractures commonly extend less than about 50 feet below the land surface. Thus, in the 2R2S panel area, a sequence of several hundred feet of unfractured rocks will likely exist between the bottom of the shallow tension cracks near the surface and the top of the fractured zone above longwall mined regions. This sequence of low-permeability rock prevents the downward migration of active-zone groundwaters into the deeper subsurface. The presence of hydrophyllic clays in the fine-grained rocks of the Sufco Mine area effectively seal fractures that may form in the subsurface, preventing appreciable downward migration of groundwater.

It is apparent in the information presented above that there is no quantifiable baseflow contribution to the surface-water system in the South Fork of Quitchupah Creek from the Price River Formation and Castlegate Sandstone formations in proposed mining areas (below monitoring point 006A). Accordingly, the South Fork of Quitchupah Creek in these areas appears to act essentially as a conveyance ditch for surface waters in this area. The surface waters that are conveyed through this area originate considerable distances up-stream of proposed mining areas. Accordingly, the potential for mining-related losses of stream water in these portions of the South Fork would likely be limited to stream losses associated with capture of surface flows through open subsidence fractures. While it is possible that such losses could occur, such losses could likely be mitigated by physically repairing the stream

channel in fractured zones. This condition would be most likely to occur in stream reaches where the stream substrate consists of exposed bedrock without appreciable alluvial cover. In areas where considerable thickness of unconsolidated sediments/alluvium is present beneath the stream channel (particularly the clayey alluvium associated with the Price River and North Horn Formations; See Appendix C), tension cracks that do form will likely heal themselves naturally as the unconsolidated alluvial sediments settle and infill any cracks that may form subsequent to subsidence.

It should be emphasized that the hydrologic conditions present in the proposed mining areas in the South Fork of Quitchupah Creek area are fundamentally different than those encountered in portions of the recently mined Pines area. The surface waters in the North Water Canyon area, for example, are largely sourced from discharge from Castlegate Sandstone bedrock groundwater systems located *within* subsided areas. In contrast, only minimal groundwater discharge has been observed in the proposed mining areas at the 2R2S panel. Rather, under pre-mining conditions, the stream generally loses small amounts of surface water over the reach between Sufco 006A and Sufco 006B and is generally unchanged in the reach between 006B and 006C. Accordingly, it is my professional opinion that the mitigation of potential subsidence-related losses of surface water in this portion of the creek would likely be practically accomplishable and essentially equivalent to a ditch maintenance operation.

Where undermining of the South Fork of Quitchupah Creek within the steep-walled canyon area surrounded by the Castlegate Sandstone escarpment occurs, there is the potential for accumulation of rock fall material onto the canyon bottom. If subsidence fractures that divert surface waters from the creek were to occur in areas subsequently covered by rock fall material, it would likely be necessary to remove this material to allow access to the original channel surface to effect channel repairs (in the event that natural healing of the subsidence fractures did not occur within a reasonable period of time).

In summary, based on the characterization of groundwater and surface-water systems presented above, and on the proposed mining plan, no significant impacts to the overall hydrologic balance are anticipated as a result of mining in the 2R2S panel.

728.320 Whether acid-forming or toxic-forming materials are present that could result in the contamination of surface water or groundwater supplies

In the general sense, acid- and toxic-forming materials in soil and rock disturbed by coal mining have the potential to impact groundwater and surface water quality. Mine discharge water from the Sufco Mine is routinely monitored for indicators of increased acidity (iron and pH) and toxic materials. Although the concentrations of iron in mine discharge water are occasionally elevated relative to springs in the region, mine discharge waters rarely exceed permitted discharge limits.

No new topsoil or waste rock piles are planned as a consequence of mining in the 2R2S panel area and no impact from acid- or toxic-forming materials is anticipated.

With the exception of modest quantities of pyrite or similar sulfide minerals, no significant quantities of any acid- or toxic-forming materials are believed to be present in the 2R2S panel area. Iron pyrite or other sulfide minerals are commonly present in western coal mines. The oxidation of pyrite, which occurs when the mineral is exposed to water and oxygen, releases H^+ ions (acid) into the mine water. The acid produced from pyrite oxidation temporarily lowers the pH of the water. However, the acid produced from pyrite oxidation is rapidly consumed by reactions with the carbonate minerals which are pervasive in the rocks associated with the coal fields of the Wasatch Plateau. Thus, acid mine discharge in mine discharge water does not occur. The iron released into the water from pyrite oxidation is readily precipitated as iron-hydroxide when it contacts oxygenated water.

It is anticipated that the mineralogical characteristics of the rocks and coals of the 2R2S panel will be generally similar to other mining areas at the Sufco Mine. Thus, the potential for acid-forming or toxic-forming materials to result in contamination of surface-water or groundwater supplies is believed to be similar to those encountered in other portions of the Sufco Mine.

728.331 What impact the proposed coal mining and reclamation operation will have on sediment yield from the disturbed areas

The sediment load of streams can potentially be affected as a result of erosion and sediment transport from disturbed areas. Canyon Fuel Company has implemented a rigorous and effective sediment control program that is designed to minimize the sediment yield from disturbed areas. This includes the use of sediment control fences, re-vegetation of previously disturbed areas, and the diversion of surface waters around disturbed areas. Runoff from disturbed areas is collected near source areas and diverted into sediment control ponds for retention and settlement of suspended solids before being discharged to natural drainages.

The 2R2S panel is accessed through the existing Sufco Mine portals where effective sediment control structures are currently in place. No new surface disturbances are proposed for the mining of this panel. The sediment control plan is described in Chapter 7, Sections 7.2.8 and 7.3.2 of the Sufco Mine MRP. Details for the East Spring Canyon Surface Facilities are shown on Plate 5-2A. The East Spring Canyon Drainage Detail map is included in the MRP as Plate 7-6. No surface facilities or disturbances within the 2R2S panel are proposed. Consequently, there is minimal potential for additional impacts resulting from coal mining activities in disturbed areas associated with mining of the 2R2S panel.

728.332 What impact the proposed coal mining and reclamation operation will have on acidity, total suspended and dissolved solids and other important water quality parameters of local impact

Impacts to the water quality of active-zone groundwater systems that support springs and seeps in the 2R2S panel area are not anticipated. The potential for appreciable increases in sediment yield as a result of mining in the 2R2S panel area (that could result in elevated suspended solids concentrations) is minimal. It should be noted that where differential subsidence of the land surface occurs (typically along longwall panel margins), there is the potential for localized changes in stream gradients. In areas where the stream gradient may be decreased, localized ponding in the stream could occur. In areas where differential subsidence could cause the stream gradient to be increased, increased stream velocities and associated erosion potential could occur locally. However, these occurrences would likely be short-lived, as the stream tends to return to equilibrium with its channel by infilling of ponded areas with available sediment and down-cutting of areas of steepened stream gradient. Additionally, because of the steepness of the stream channel gradient in most areas (relative to the magnitude of the anticipated ground subsidence) the lengths of potential ponded areas in the stream would likely be modest.

Thus, detrimental impacts to important water quality parameters such as acidity, total suspended solids, and total dissolved solids in the South Fork of Quitcupah Creek or in springs in the 2R2S panel area are generally considered unlikely.

It should be noted that in the event that subsidence fracturing of bedrock horizons beneath a stream or near the discharge location of a spring occurs, there is a potential of a modest, temporary increase in TDS concentration. This increase could result if the bedrock horizons fractured contained pyrite or other sulfide minerals. When subsidence-fractured rock surfaces expose pyrite to an aqueous, oxygen-rich environment, sulfide mineral oxidation may occur. Under such circumstances some solutes, primarily sulfate, bicarbonate, calcium, and magnesium can increase. Such reactions typically do not occur in deep groundwater systems because of the lack of available oxygen in these systems. Because the pyrite is consumed by the oxidation reaction, the reaction ceases when all the freshly exposed pyrite is oxidized.

Fuels, greases, and oils are stored and used in the Sufco Mine permit area. There is the potential for spillage of these substances during equipment maintenance and operations, during filling of storage tanks and vehicle tanks, and from leakage from potentially leaking storage tanks.

The Sufco Mine has previously implemented a rigorous spill prevention plan that is designed to minimize the potential for spillage of these substances and to ensure that any potential spills that may occur are promptly cleaned-up. This plan will continue to be followed during mining in the 2R2S panel. Because the 2R2S panel will be accessed from the permitted existing surface facilities area (including equipment maintenance and fueling areas and

chemical storage areas), there should be no additional potential for spillage as a result of mining of the 2R2S panel.

The discharge of Sufco Mine water to surface water drainages will have an impact on the water quality of receiving waters. The nature and magnitude of this impact is related to the relative quality of the receiving water and the mine discharge water. If the mine discharge water is of poorer quality than the receiving water, then the quality of the receiving water will be degraded proportionally. If the mine discharge water is of better quality than the receiving water, the quality of the receiving water will be improved. Historically, the discharge water from the Sufco Mine has generally been of relatively good quality and has usually met the beneficial use standards of the receiving water (UDOGM, 2012).

Based on the fact that the geologic conditions at the 2R2S panel are generally similar to those in the adjacent existing Sufco Mine permit area, it is anticipated that the character of groundwater inflows in terms of both quality and quantity will likely be similar to those that have historically occurred in the existing Sufco Mine. Consequently, no impacts to important water quality parameters above those that may occur at the existing Sufco Mine area are anticipated as a result of mining in the 2R2S panel. The discharge of Sufco Mine water is regulated under a UPDES permit issued from the Utah Division of Water Quality.

728.333 What impact the proposed coal mining and reclamation operation will have on flooding or streamflow alteration

There are no known geologic features in the 2R2S panel area that are substantively different than those that have been encountered elsewhere in the Sufco Mine (Personal communication, Mark Bunnell, 2012). Mining practices to be utilized in mining the 2R2S panel area will also be similar to those currently implemented at the Sufco Mine.

Accordingly, it is anticipated that discharge rates from the Sufco Mine during mining in the 2R2S panel will likely be of similar magnitude to those that are currently occurring. Thus, no significant increase to the flooding or streamflow alteration potential of Sufco Mine discharge water to Quitchupah Creek is anticipated above that currently occurring as a result of mining of the 2R2S panel.

728.334 What impact the proposed coal mining and reclamation operation will have on groundwater and surface-water availability

It has been demonstrated that the active-zone groundwater systems that support springs and seeps in the 2R2S panel area are isolated from the inactive-zone groundwater systems that will be encountered during mining in the 2R2S panel. As noted above, if shallow Castlegate Sandstone springs or their near-surface groundwater flowpath areas in the 2R2S panel area were to be directly undermined and subsided, there would be the potential for diminished discharge from the springs. The movement of spring discharge locations for these springs could also potentially occur. However, no Castlegate Sandstone springs are to be

undermined in the proposed mining plan. Also discussed previously, the potential for impacts to springs and seeps in the overlying Price River and North Horn Formations is considered minimal. Therefore, the availability of these groundwaters and surface waters will likely not be impacted.

Current mining operations have made available several hundreds of gallons per minute of mine discharge water that has previously been unavailable for use. It is anticipated that as mining progresses in the 2R2S panel, additional groundwater inflows into the mine workings will occur and discharge of groundwater to the Quitchupah Creek surface-water drainage will likely continue. It should be noted that the discharge of mine water at current discharge rates would likely not be sustained over a long period of time. Historically, discharge rates from individual inactive-zone mine inflows usually decline over time. This is because the inactive-zone groundwater is being removed from storage and is not being actively recharged. Rather, the rate of discharge from the mine is best correlated with the rate at which the mine workings are advanced into new mining areas, and not to the total cumulative footprint of the mine workings (Mayo and Associates, 1997). It should not be assumed that the groundwater discharging from the mine will be a long-term source of water.

728.350 Whether the underground coal mining and reclamation activities may result in contamination, diminution or interruption of State-appropriated water

The active-zone groundwater systems that support springs and seeps in the 2R2S panel area are isolated from the inactive-zone groundwater systems that will likely be encountered

during mining activities. Accordingly, the potential for contamination, diminution, or interruption of groundwater systems resulting from draining of active-zone groundwaters into deep horizons (or the mine workings) is considered remote. Inactive-zone groundwater systems that will likely be encountered during mining in the 2R2S panel include primarily perched systems associated with sandstone channels in the Blackhawk Formation. While deep, inactive-zone Blackhawk Formation groundwater systems will be intercepted and dewatered during mining activities, in the pre-mining condition, there are no known uses or State appropriations of these waters.

8.0 Recommended Monitoring Plan

The recommended monitoring plan for groundwaters and surface waters near the 2R2S panel area is presented below. The purposes of the recommended groundwater and surface-water monitoring plan are to 1) document the effects of seasonal and climatic variability on groundwater and surface-water resources, 2) collect data to document that the shallow, active-zone groundwater systems in the 2R2S panel area operate independently of the deep, inactive-zone groundwater systems encountered in the Sufco Mine, 3) to provide verification that mining-related impacts to groundwater and surface-water systems do not occur and 4) to determine the magnitude and character of any potential impacts to water quantity or water quality if such were to occur. The recommended monitoring plan is summarized below.

Springs

We recommend the monitoring of four springs in the vicinity of the 2R2S panel area. These include 006A Spring, Roberts Spring, RS-A, and RS-B. Each of these springs discharge from the Price River Formation (See Figure 6 for monitoring station locations). Impacts to water quantity and water quality resulting from the undermining of the 2R2S longwall panel are not anticipated. To verify this conclusion, we recommend that each of these four springs be monitored quarterly for discharge rate and field water quality parameters while the mining in the 2R2S longwall panel is occurring under the springs and for a period of two years after mining in the area is complete.

Streams

We recommend the monitoring of stream monitoring stations Sufco 006, Sufco 006A, Sufco 006B, and Sufco 006C (See Figure 6 for monitoring site locations) in conjunction with the undermining of the 2R2S longwall panel. We recommend that these sites be monitored bi-weekly for discharge rate and for field water quality parameters while mining in the 2R2S longwall panel is occurring under the stream and thereafter quarterly for a period of two years. Quarterly monitoring at site Sufco 006 for discharge rate and field and laboratory water quality measurements is already included in Sufco Mine's monitoring plan.

Use of the Groundwater and Surface-Water Monitoring Plans

The purposes of Sufco's groundwater and surface-water monitoring plans are to provide verification that mining-related impacts to groundwater and surface-water systems do not occur, and to determine the magnitude and character of potential impacts if they do occur. Comparisons between monitoring data (for the parameter of interest or concern) collected during baseline, pre-mining conditions should be made with monitoring data (for the same parameter or interest of concern) collected during the operational and/or reclamation phase of mining to determine impacts. When changes to monitored parameters subsequent to mining in an area are observed in the monitoring data, an analysis of all relevant data should be performed to determine the cause(s) of the change in the hydrologic condition. In utilizing the monitoring data to detect or quantify potential mining-related impacts, it is necessary to evaluate all factors relevant to the prevailing hydrologic conditions together with the monitoring data. This is because other factors, which are not related to the mining activity, may cause changes in the prevailing hydrologic conditions. In particular, climatic variability (which may result in increased or decreased groundwater and surface-water flow rates, changes in water levels in wells, and changes in water quality) should be carefully evaluated together with the monitoring data. Other factors that may influence coal mine hydrology include grazing practices, land use, and range condition. A convenient and useful means of evaluating regional climatic data is through the use of the Palmer Hydrologic Drought Index, which is a monthly value that indicates the severity of wet and dry spells that is generated by the National Climatic Data Center and available on-line at

<http://www1.ncdc.noaa.gov/pub/data/cirs/drd964x.phdi.txt>.

The use of Stiff (1951) diagrams is a useful technique that is frequently used to analyze and compare groundwater and surface-water quality characteristics from various sources.

Information required to create Stiff diagrams is available from the Division of Oil, Gas and Mining Coal Water Quality Database, which is freely accessible at:

<http://ogm.utah.gov/coal/edi/wqdb.htm>. Additional information on coal mining hydrology and potential mining-related impacts, which can be used to assist in the evaluation of monitoring data and potential mining-related impacts, is provided on the Utah Division of Oil, Gas and Mining web page at <http://ogm.utah.gov/coal/water/default.htm>.

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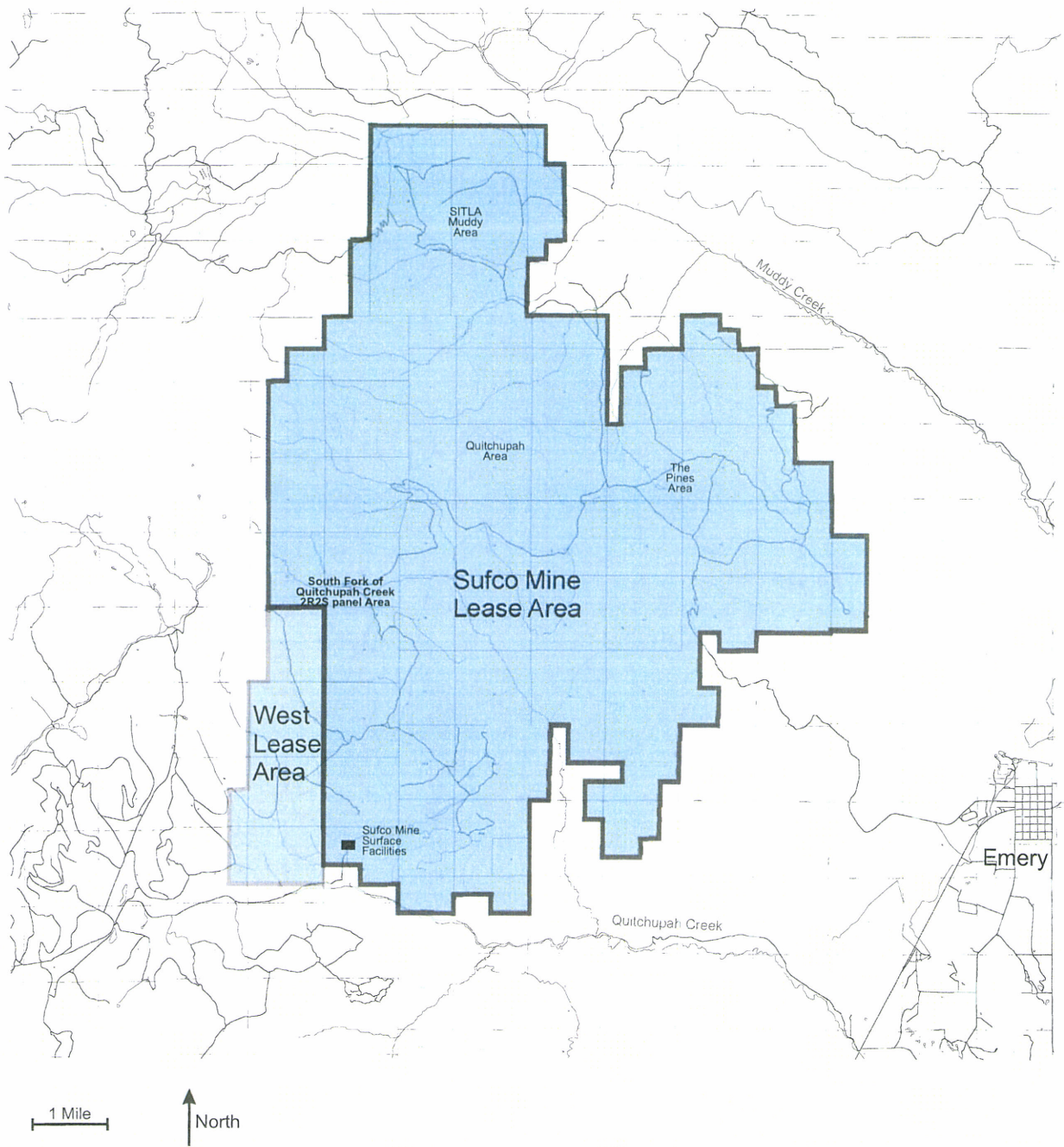


Figure 1 Location of Sufco Mine and 2R2S panel areas.

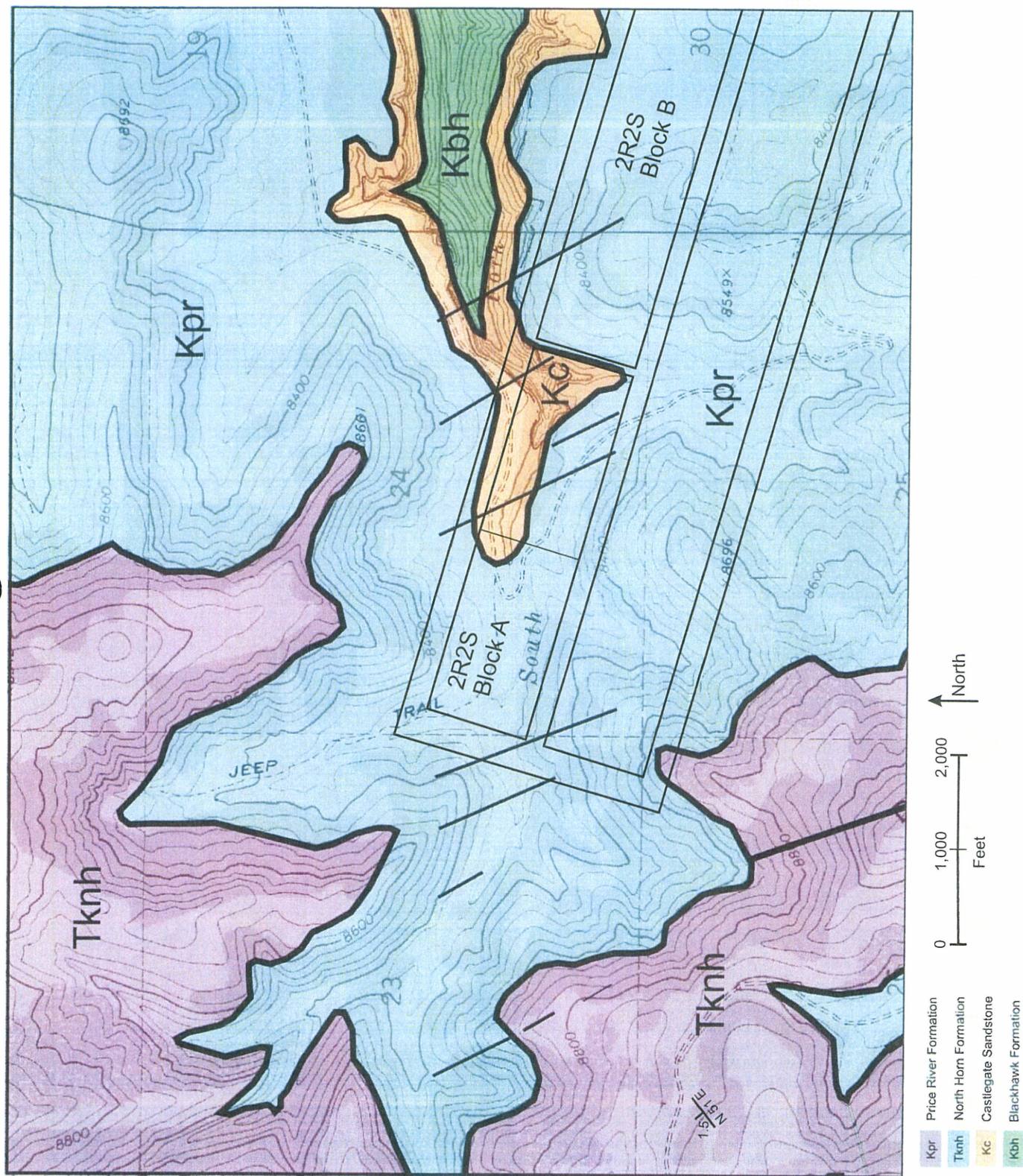


Figure 2 Geologic map of the 2R2S panel area.

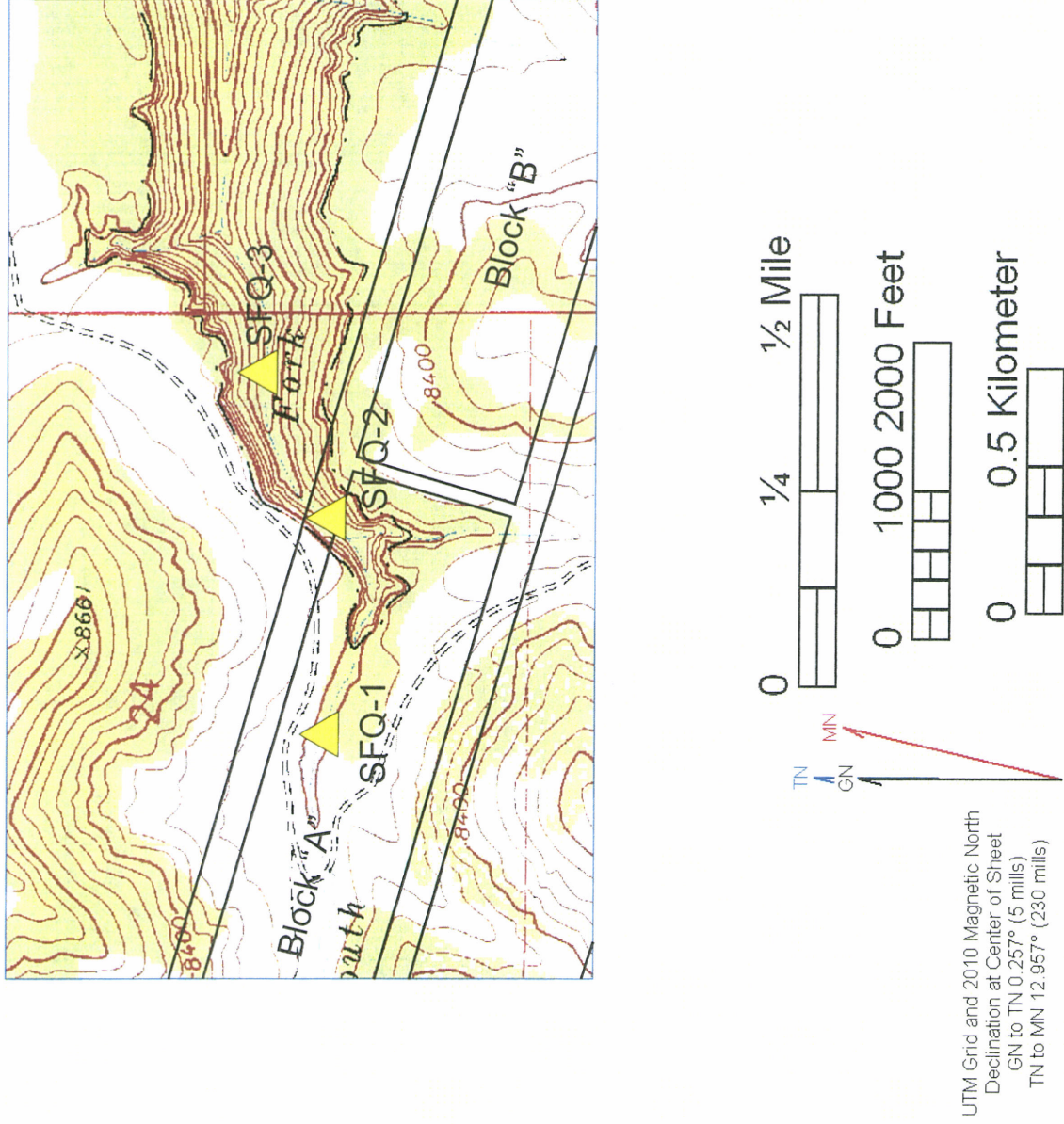
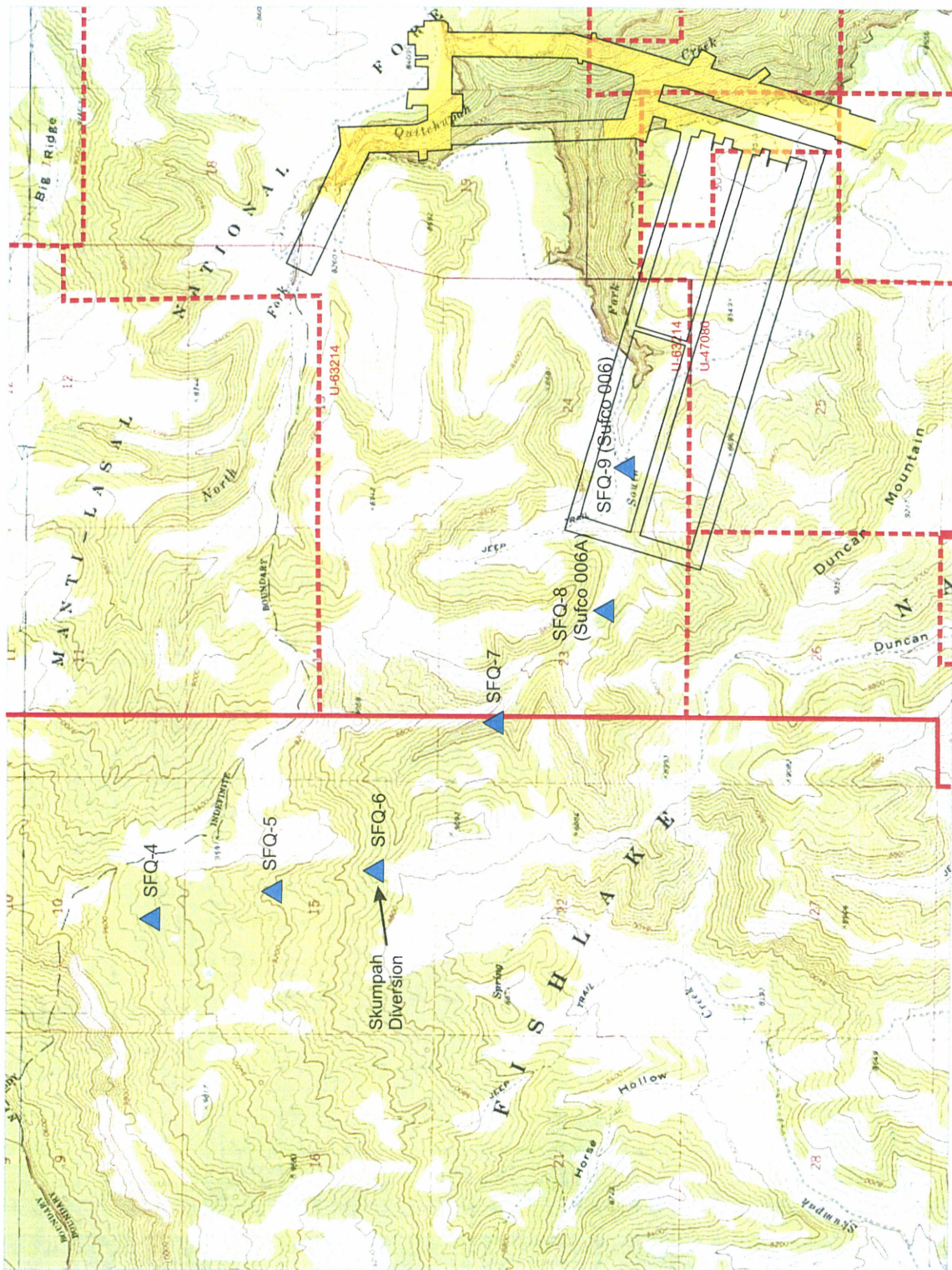


Figure 3 Discharge monitoring locations for the 16 October 2007 survey.

111° 28' 38.082" W
39° 0' 2.987" N

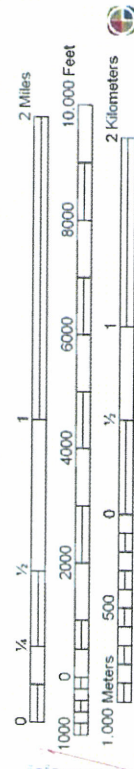
111° 23' 3.558" W
39° 0' 4.222" N



38° 56' 47.207" N
111° 28' 36.769" W

38° 56' 48.440" N
111° 23' 2.500" W

1927 North American Datum: UTM grid zone 12
Generated by BigTopo7 (www.igage.com)
Map compiled from USGS Quads: Heliotrope Mountain;
UT Acord Lakes; UT



BigTopo Map

Figure 4 Discharge monitoring locations for the 4 September 2009 survey.

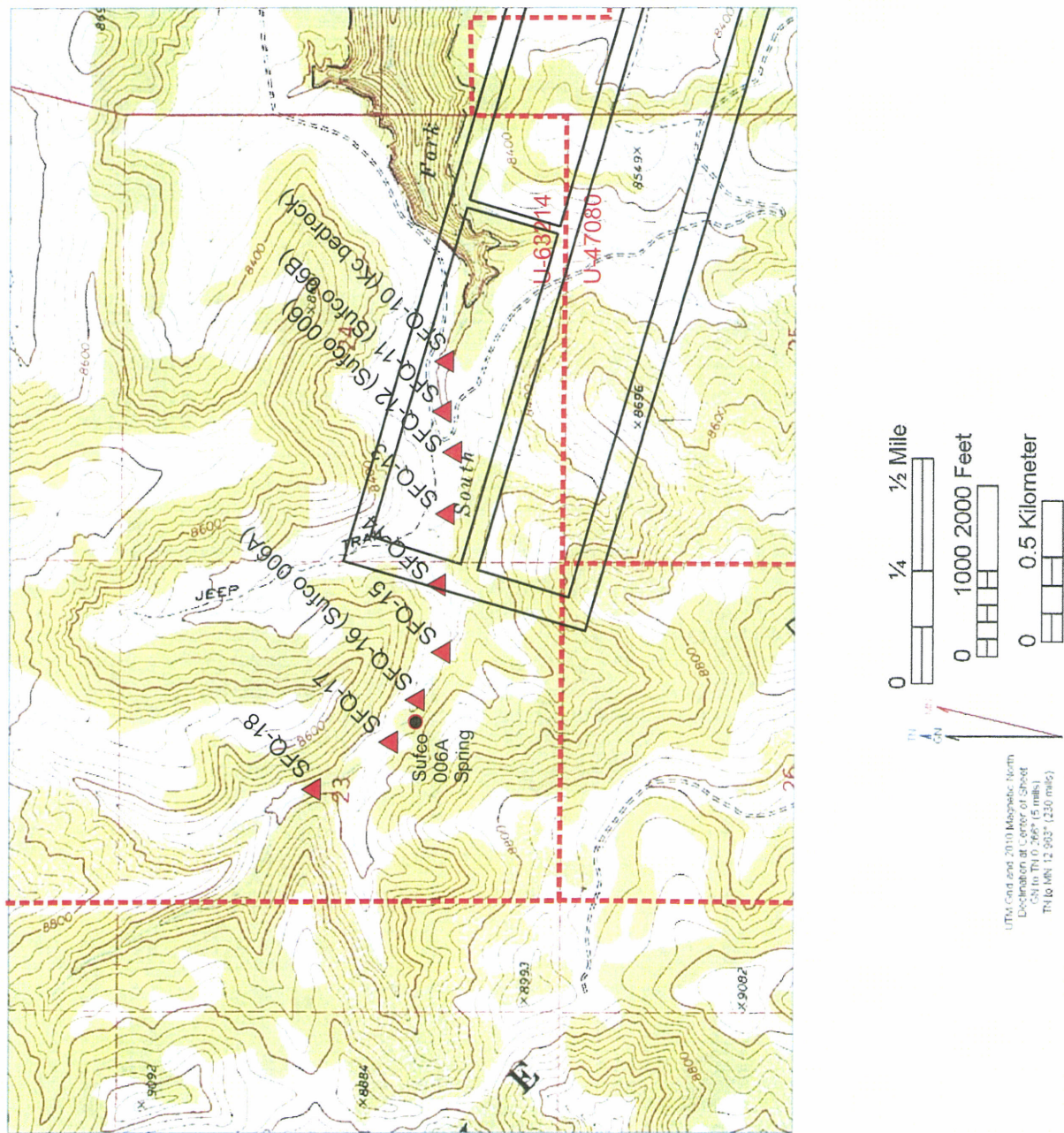


Figure 5 Discharge monitoring locations for 12 October 2009 survey.

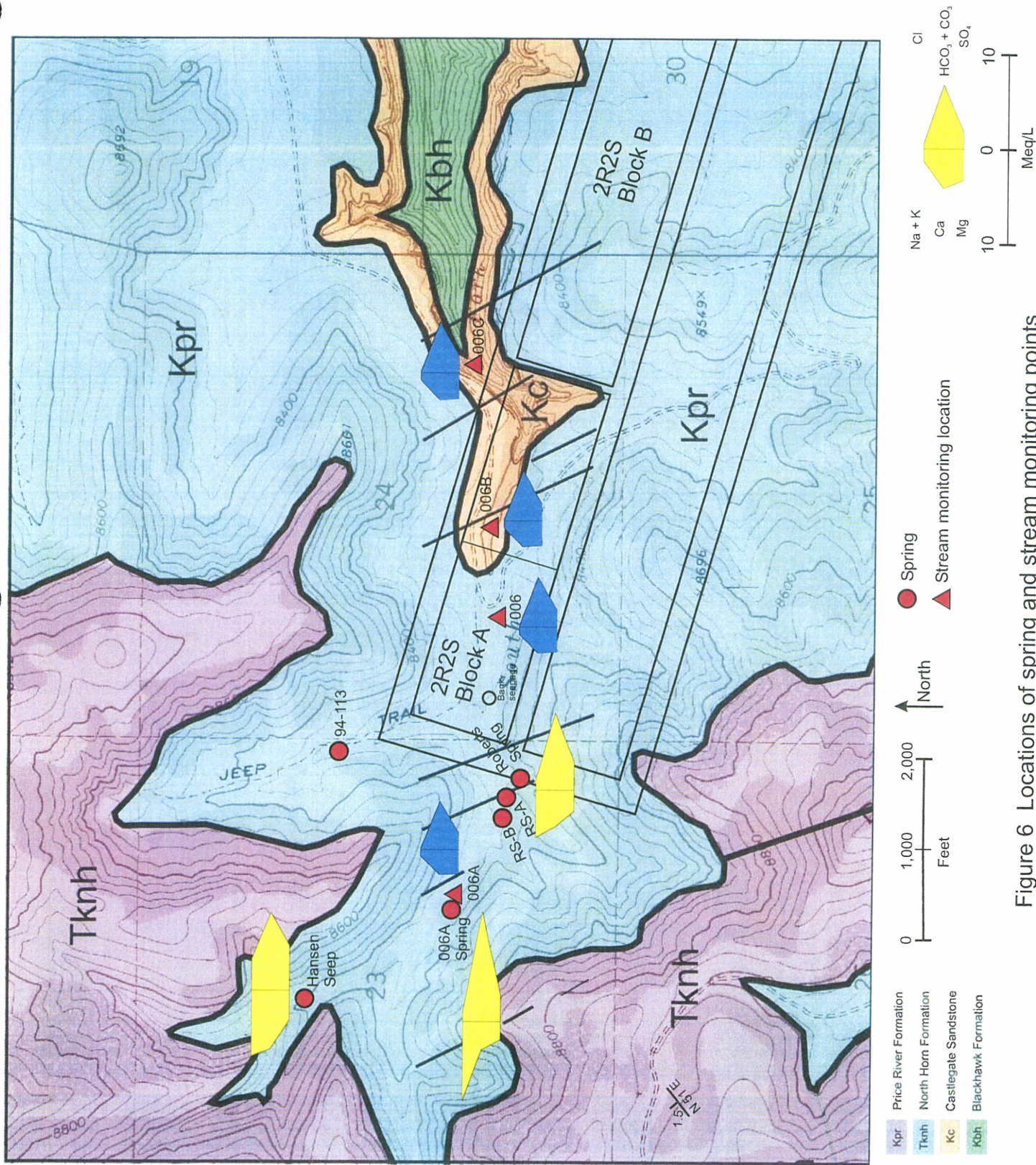


Figure 6 Locations of spring and stream monitoring points with Stiff diagrams.

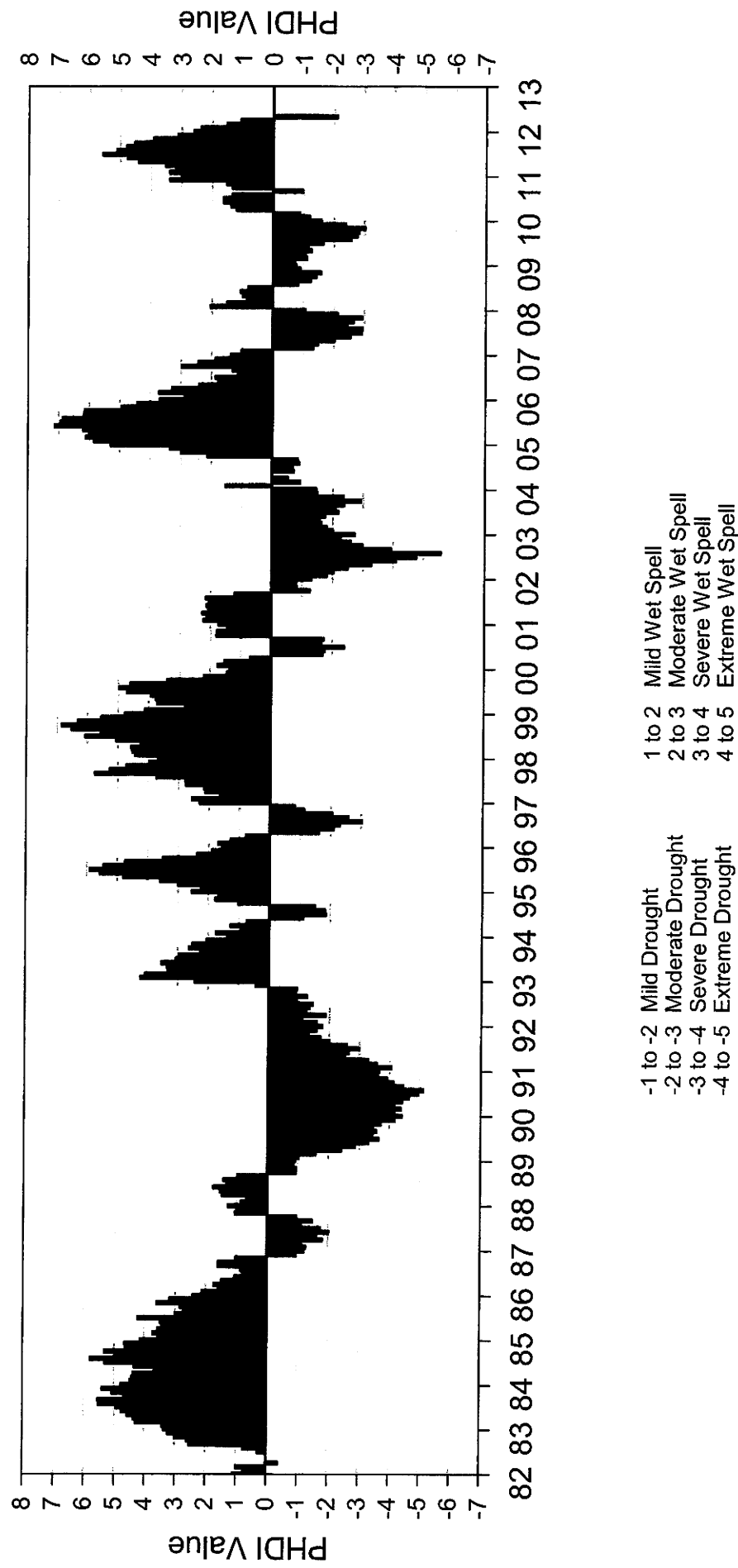


Figure 7 Plot of Palmer Hydrologic Drought Index for Utah Region 4.

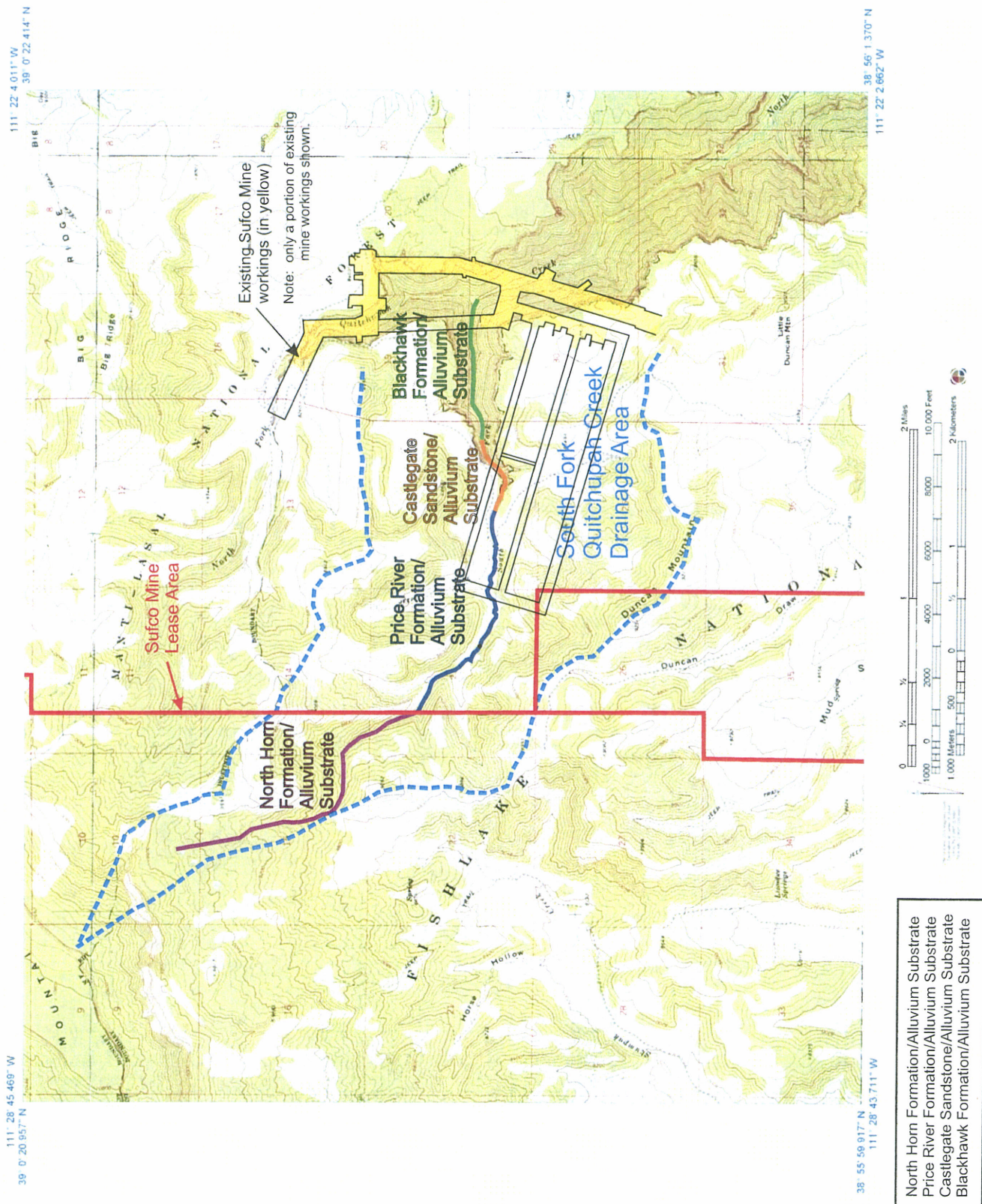


Figure 8 Geologic formation present in stream substrate.

17 June 2011
Stream Survey

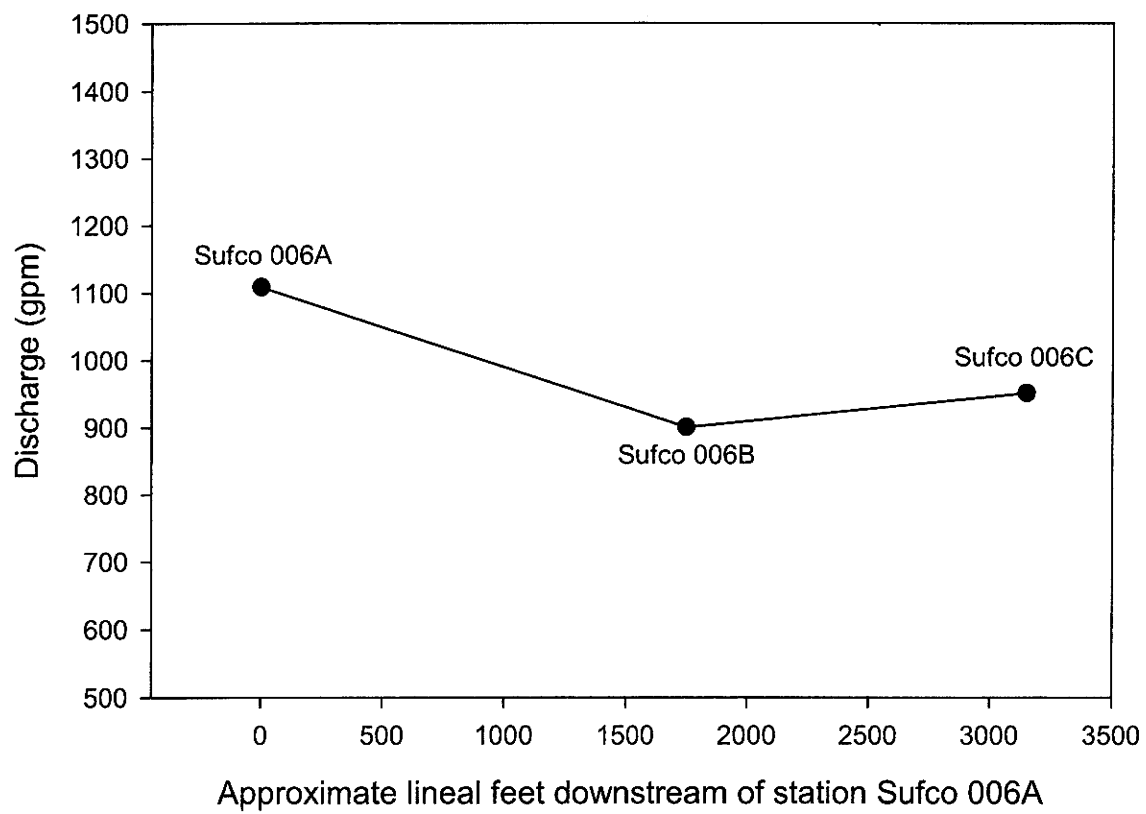


Figure 9 17 June 2011 stream survey.

21 September 2011
Stream Survey

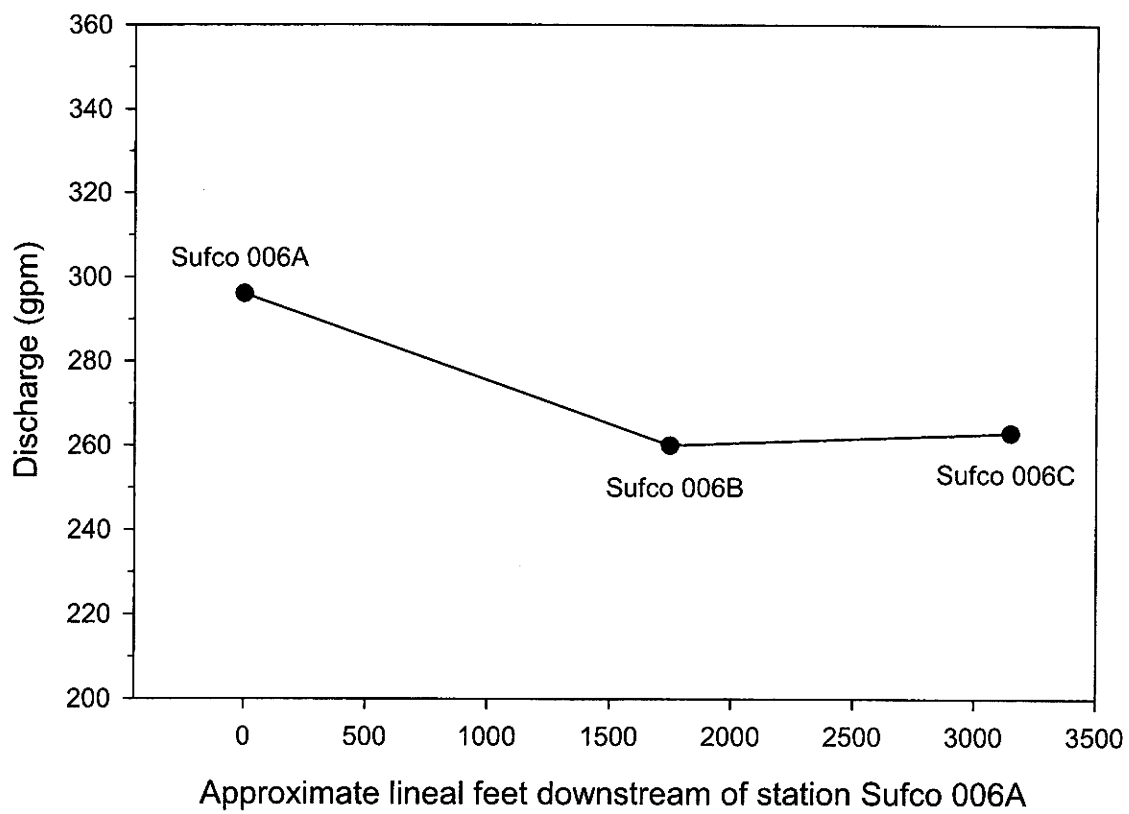


Figure 10 21 September 2011 stream survey.

12 October 2011
Stream Survey

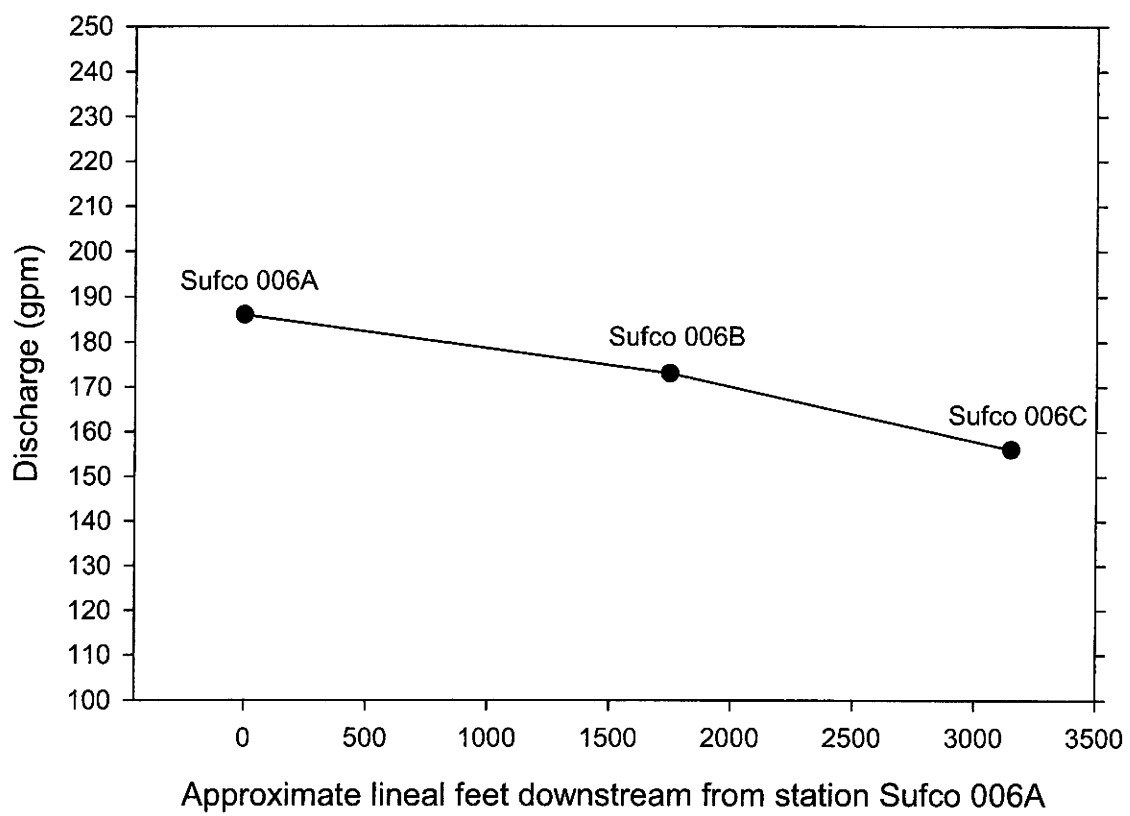


Figure 11 12 October 2011 stream survey.

1 June 2012
Stream Survey

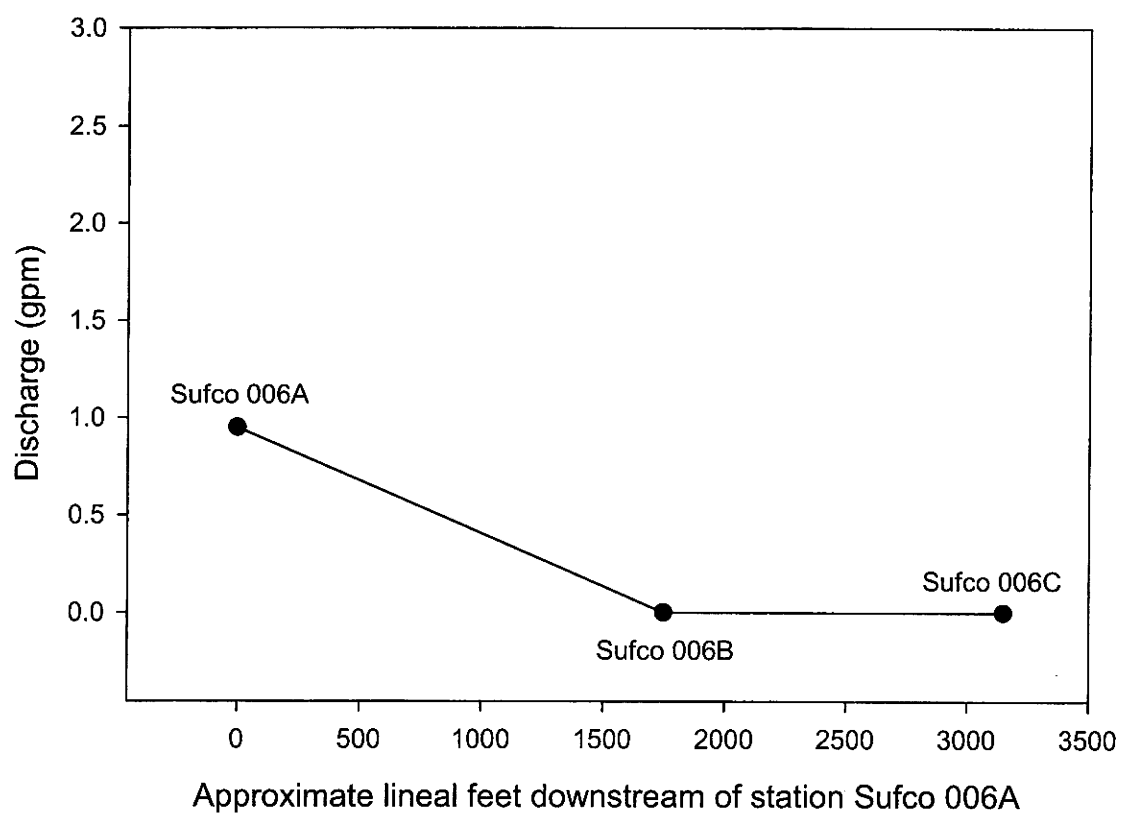


Figure 12 1 June 2012 stream survey.

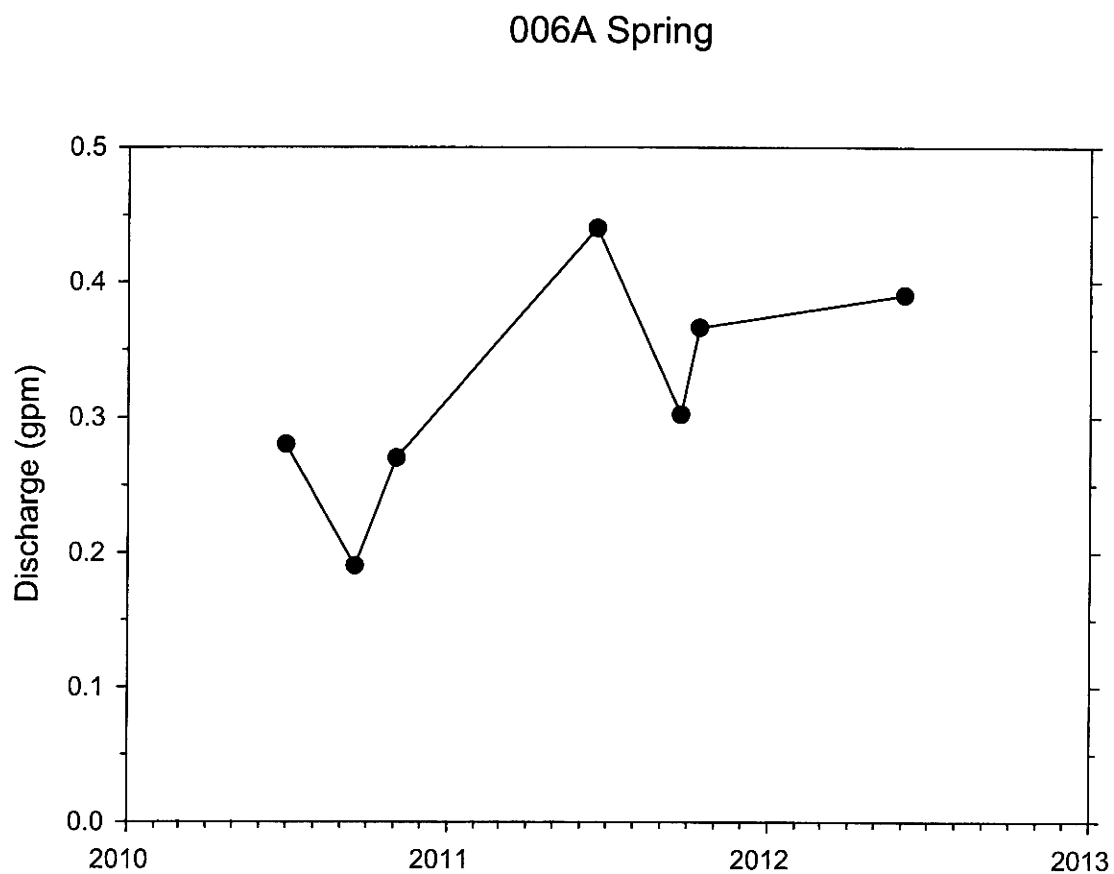


Figure 13 Discharge hydrograph for 006A spring.

Roberts Spring

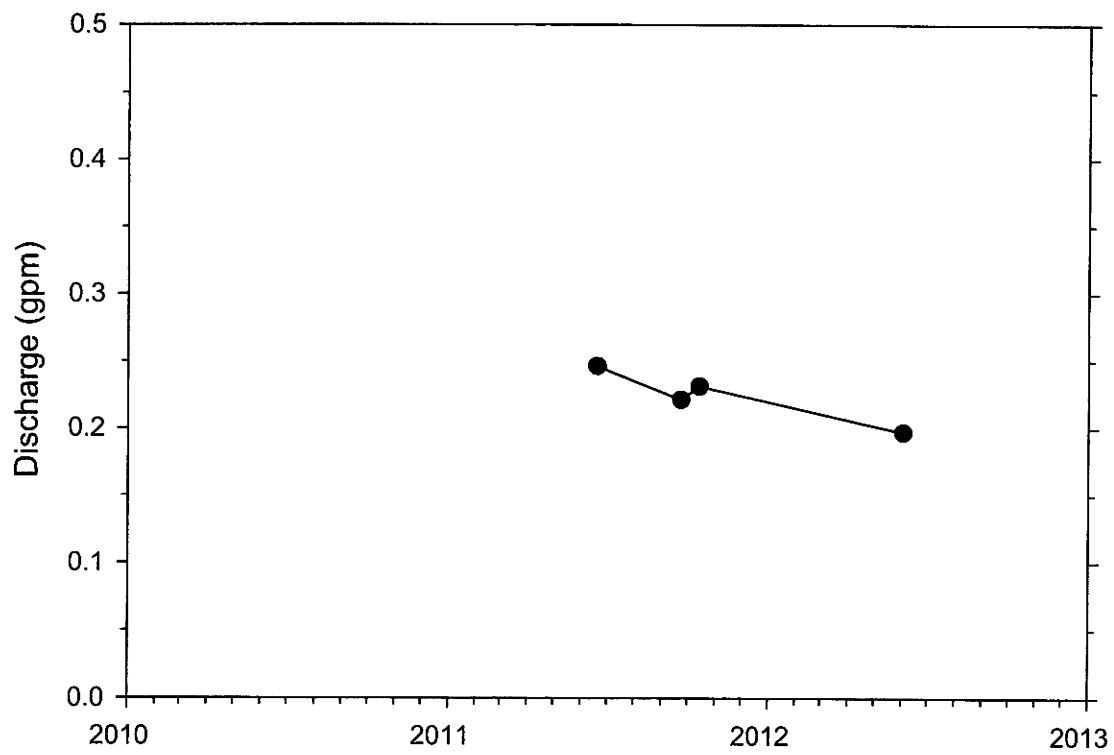
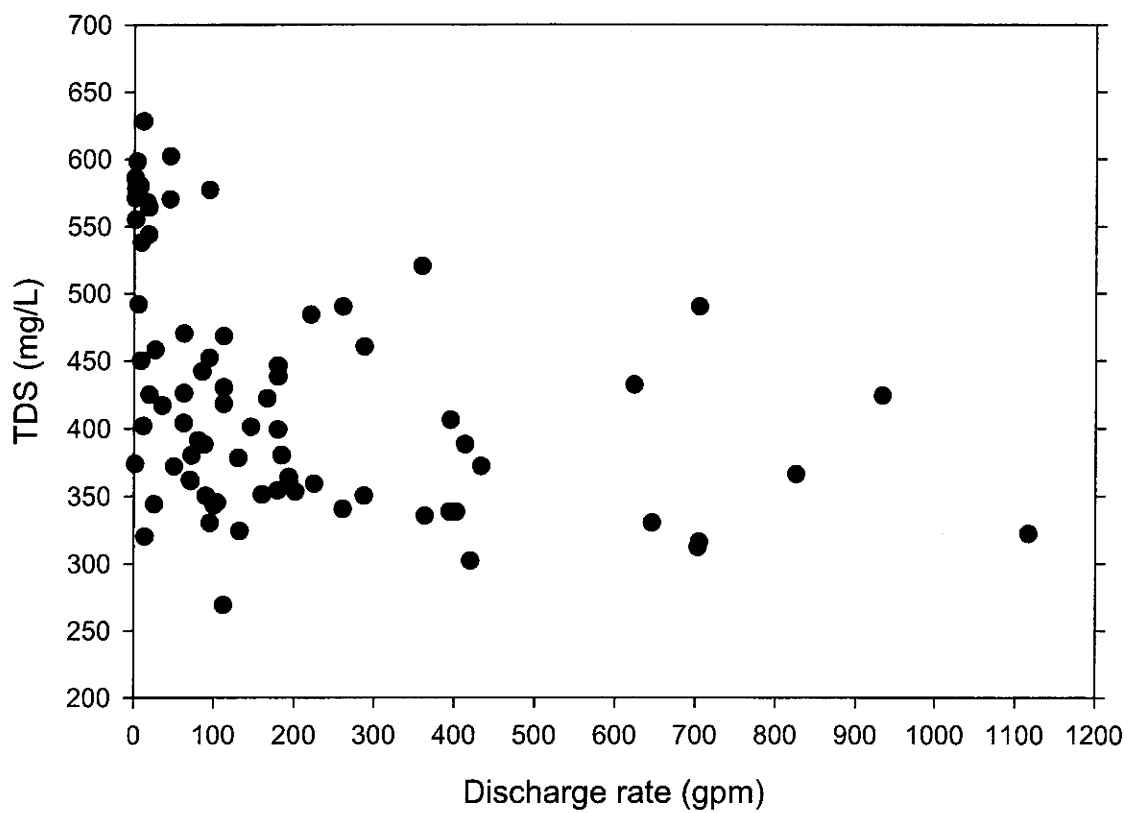


Figure 14 Discharge hydrograph for Roberts Spring.



South Fork Quitchupah Creek (Sufco 006)

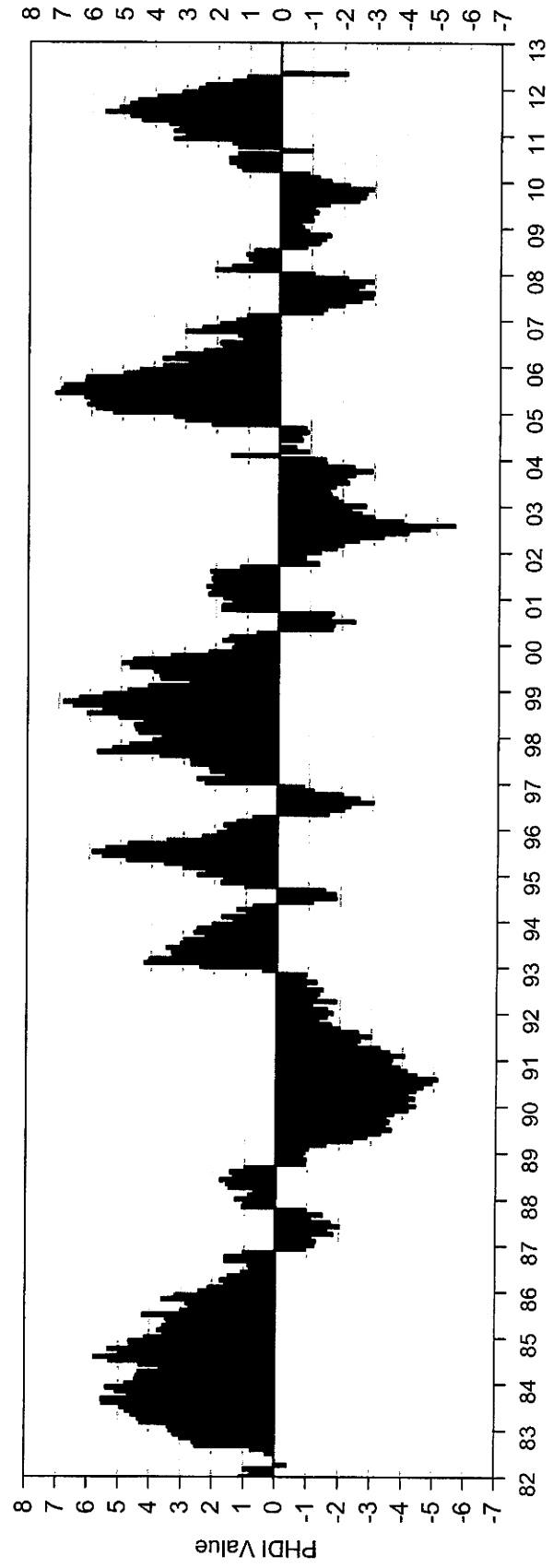
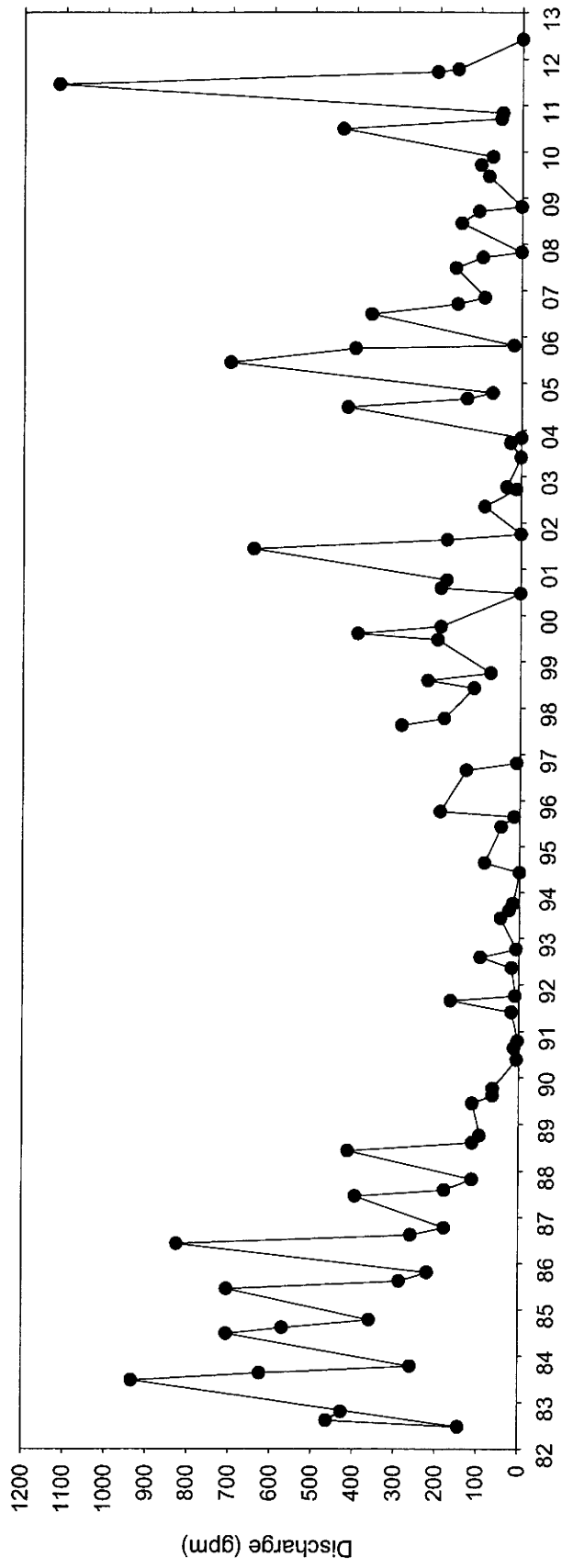


Figure 16 Discharge hydrograph for the South Fork of Quitchupah Creek (Sufco 006) together with plot of Palmer Hydrologic Drought Index (1982-2012).

Table 1 Baseline monitoring locations for groundwater and surface-water.

Site ID	Location	Location UTM, NAD 27	Geology	Use
Springs				
Sufco 006A Spring	South Fork Quitichupah Creek drainage	462827	Price River Formation	Wildlife/stockwatering
Roberts Spring	South Fork Quitichupah Creek drainage	463270	Price River Formation	Wildlife/stock watering
RS-A	South Fork Quitichupah Creek drainage	463193	Price River Formation	Wildlife/stock watering
RS-B	South Fork Quitichupah Creek drainage	463123	Price River Formation	Wildlife/stock watering
Hansen Seep	South Fork Quitichupah Creek drainage	462514	Price River Formation	Wildlife
94-113	South Fork Quitichupah Creek drainage	463350	Price River Formation	None apparent/wildlife
Streams				
Sufco 006	South Fork Quitichupah Creek	463784	Price River Formation	Wildlife/stockwatering
Sufco 006A	South Fork Quitichupah Creek	462900	Price River Formation	Wildlife/stockwatering
Sufco 006B	South Fork Quitichupah Creek	463932	Price River/Castlegate contact area	Wildlife/stockwatering
Sufco 006C	South Fork Quitichupah Creek	464673	Castlegate Sandstone (lower)	Wildlife/stockwatering

Table 2 Discharge measurements from the South Fork of Quitchupah Creek, 2007-2012.

Site ID	Location	Date	Location UTM, NAD 27	Discharge (gpm)	Measurement type*
SFQ-1	Top of Castlegate Sandstone	16-Oct-07	464146	4312827	8.11
SFQ-2	Middle of Castlegate Sandstone	16-Oct-07	464578	4312818	5.90
SFQ-3	Near Castlegate Sandstone/Blackhawk Contact	16-Oct-07	464941	4312950	6.10
SFQ-4	Upper South Fork site	4-Sep-09	460899	4315842	127
SFQ-5	USFS Cattle Diversion	4-Sep-09	461073	4315053	215
SFQ-6	Flow to Skumpah Diversion	4-Sep-09	461230	4314420	29
SFQ-7	Lower South Fork Site	4-Sep-09	462180	4313626	149
SFQ-8	Sufco 006A Monitoring Site	4-Sep-09	462900	4312941	166
SFQ-9	Sufco 006 Monitoring Site	4-Sep-09	463784	4312810	121
SFQ-10	At Castlegate Sandstone contact	12-Oct-09	464116	4312849	66.5
SFQ-11	Sufco 006B Monitoring Site	12-Oct-09	463932	4312856	65.2
SFQ-12	Sufco 006 Monitoring Site	12-Oct-09	463784	4312810	69.2
SFQ-13	Middle Site	12-Oct-09	463575	4312844	69.2
SFQ-14	Lower Meadow Area	12-Oct-09	463310	4312861	69.2
SFQ-15	Top of Meadow Area	12-Oct-09	463079	4312857	72.0
SFQ-16	Sufco 006A Monitoring Site	12-Oct-09	462900	4312941	74.8
SFQ-17	Forks Area	12-Oct-09	462769	4313040	72.0
SFQ-18	Upper Site	12-Oct-09	462598	4313306	76.3
006A	Monitoring site Sufco 006A	17-Jun-11	462900	4312941	1109
006B	Monitoring site Sufco 006B	17-Jun-11	463932	4312856	900
006C	Monitoring site Sufco 006C	17-Jun-11	464673	4319209	951
006A	Monitoring site Sufco 006A	21-Sep-11	462900	4312941	296
006B	Monitoring site Sufco 006B	21-Sep-11	463932	4312856	260
006C	Monitoring site Sufco 006C	21-Sep-11	464673	4319209	263
006A	Monitoring site Sufco 006A	12-Oct-11	462900	4312941	186
006B	Monitoring site Sufco 006B	12-Oct-11	463932	4312856	173
006C	Monitoring site Sufco 006C	12-Oct-11	464673	4319209	156
006A	Monitoring site Sufco 006A	1-Jun-12	462900	4312941	0.95
006B	Monitoring site Sufco 006B	1-Jun-12	463932	4312856	0
006C	Monitoring site Sufco 006C	1-Jun-12	464673	4319209	0

*Measurement Types:

- 1: calibrated container and stopwatch
- 2: Marsh-McBirney electromagnetic current velocity meter and wading rod
- 3: 90-degree V-notch weir
- 4: 12-inch Parshall flume

Table 3 Discharge and water quality data for South Fork Quitcupah Creek area.

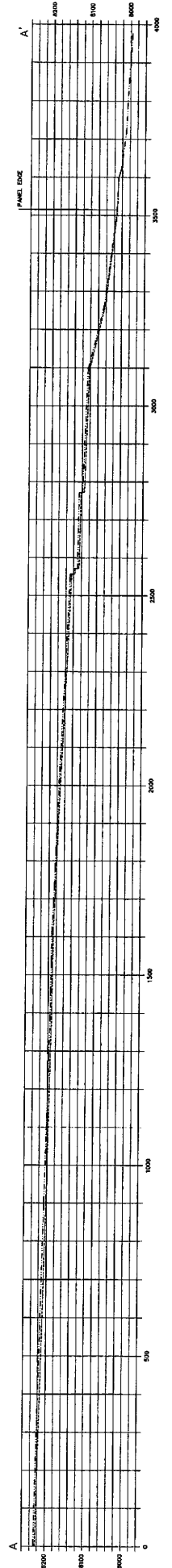
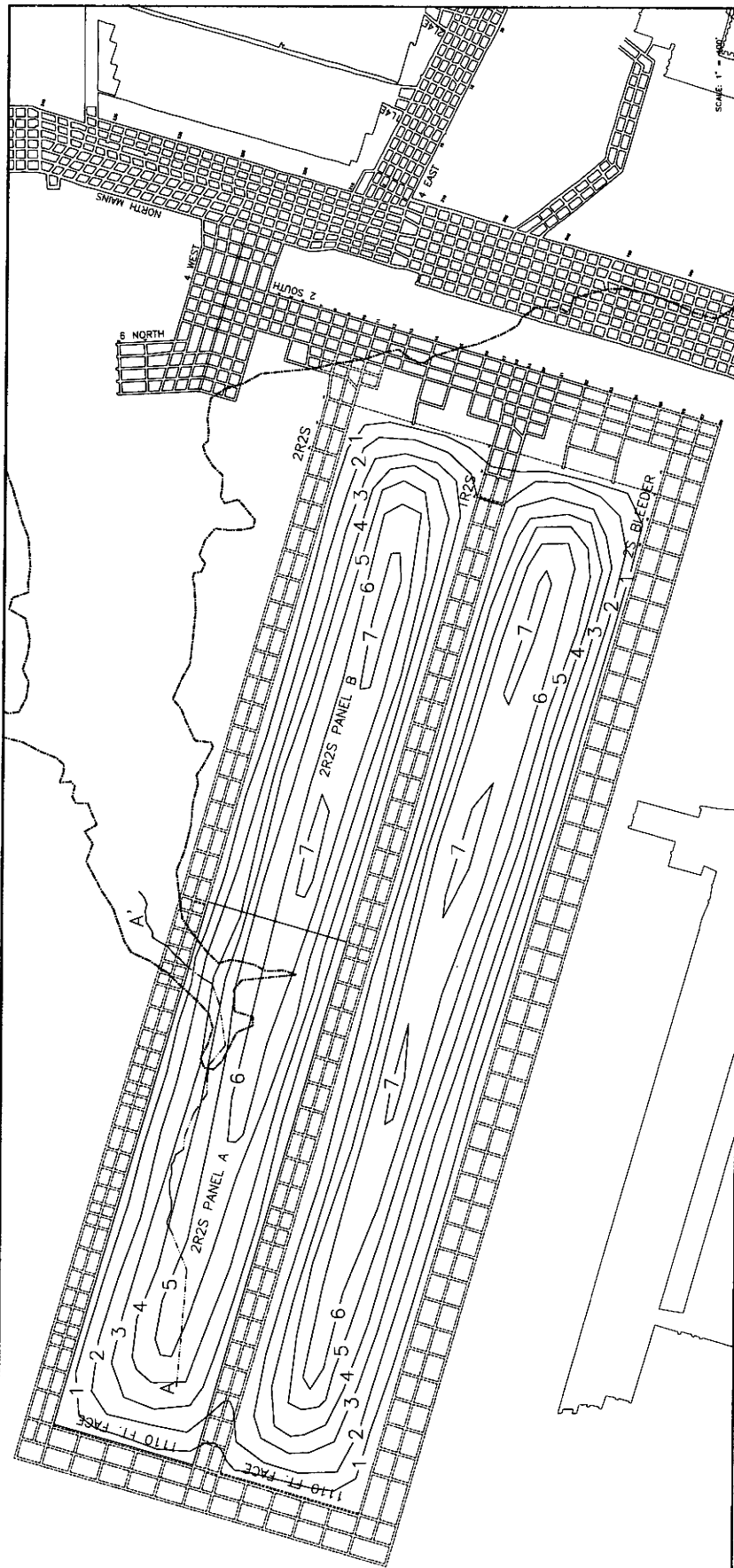
Site	Date	Flow gpm	Water T °C	Cond µS/cm	pH	TDS mg/L	Ca ²⁺ mg/L	Mg ²⁺ mg/L	Na ⁺ mg/L	K ⁺ mg/L	HCO ₃ ⁻ mg/L	CO ₃ ²⁻ mg/L	SO ₄ ²⁻ mg/L	Cl ⁻ mg/L	Fe(T) mg/L	Fe(D) mg/L	Mn(T) mg/L	Mn(D) mg/L
Creeks																		
Sufco 006 (South Fork Quitcupah Creek)	20-Oct-1982	426.4	1	545	8.6										3.00	0.08		0.055
Sufco 006 (South Fork Quitcupah Creek)	12-Aug-1982	462.3	12	510	8.3										2.88	0.075		0.02
Sufco 006 (South Fork Quitcupah Creek)	22-Jun-1982	143.6	12.5	423	7.7												0.005	
Sufco 006 (South Fork Quitcupah Creek)	21-Jun-1983	934	16	710	8	424	60	35.52	59		400.2	0	74	36	0.81	0.03	0.065	
Sufco 006 (South Fork Quitcupah Creek)	16-Aug-1983	624	17	680	7.6	432	56	33.6	52.5		370.9	0	62	4	5.4	0.09	0.045	0.015
Sufco 006 (South Fork Quitcupah Creek)	12-Oct-1983	260	10	750	7.8	490	68	37.92	55	3.5	390.4	0	87	34	0.25	0.04	0.08	0.07
Sufco 006 (South Fork Quitcupah Creek)	21-Jun-1984	705	11	760	7.7	490	91.6	18.72	66	3.6	416	0	66	36.4	0.07	0.01	0.04	0.03
Sufco 006 (South Fork Quitcupah Creek)	9-Aug-1984	570	18	1300	7.8	850	64	108	47.8		384.3	0	405	29.4	1.3	0.07	0.09	
Sufco 006 (South Fork Quitcupah Creek)	11-Oct-1984	359	6	680	8.1	520	64	55.5	60.3		390.4	0	95	34	0.06	0.23	0.09	0.07
Sufco 006 (South Fork Quitcupah Creek)	13-Jun-1985	705	14	490	8	316	58.8	23.8	40	3.8	256	0	75	14.2	24.6	0.03	0.73	0.01
Sufco 006 (South Fork Quitcupah Creek)	14-Aug-1985	287	13	708	8.4	460	60	32.2	80	3.5	348.9	0	85	28	0.06	0.01	0.03	0.02
Sufco 006 (South Fork Quitcupah Creek)	22-Oct-1985	220	1	719	8.2	484	77.6	36.5	49.8		329.4	0	87	24.5	0.56	0.01	0.09	0.05
Sufco 006 (South Fork Quitcupah Creek)	3-Jun-1986	826	16	635	8.35	366	50.4	33.1	38.03		279	0	95	20.3	0.62	0.01	0.07	0.02
Sufco 006 (South Fork Quitcupah Creek)	13-Aug-1986	260	17	622	8.4	340	54.4	34.6	39.82		275.7	14.4	69	17.2	0.57	0.01	0.05	0.01
Sufco 006 (South Fork Quitcupah Creek)	9-Oct-1986	180	6	742	8.2	446	64.8	33.6	55.2		256.2	0	80	3.9	1.01	0.02	0.11	0.06
Sufco 006 (South Fork Quitcupah Creek)	18-Jun-1987	395	10	666	8	406	84	18.7	34.72		315	0	77	15	0.26	0.01	0.07	0.05
Sufco 006 (South Fork Quitcupah Creek)	5-Aug-1987	180	18	717	8.2	438	54.8	31.29	34.12		301	0	75	13.7	0.2	0.01	0.08	0.05
Sufco 006 (South Fork Quitcupah Creek)	28-Oct-1987	112	5	635	8.2	418	62.63	33.53	43.53		348	0	80	17.4	0.64	0.01	0.11	0.09
Sufco 006 (South Fork Quitcupah Creek)	7-Jun-1988	413	16	715	7.9	388	114.4	0.1	29.69		316	0	73	11.3	0.3	0.03	0.09	0.05
Sufco 006 (South Fork Quitcupah Creek)	9-Aug-1988	112	17.5	659	8.25	430	115.2	2.88	32.59		301	0	83	32.5	0.68	0.03	0.09	0.03
Sufco 006 (South Fork Quitcupah Creek)	5-Oct-1988	94	15.5	782	7.1	577	156	8.4	38.81		381	0	174	15	0.75	0.03	0.15	0.08
Sufco 006 (South Fork Quitcupah Creek)	14-Jun-1989	112	15.5	798	7.3	468	65.48	32.61	40.05		344	0	18	2.9	0.86	0.2	0.17	0.14
Sufco 006 (South Fork Quitcupah Creek)	15-Aug-1989	63	19.5	759	7.1	470	63.57	27.35	43.68		328	0	84	13.8	1.29	0.03	0.08	0.01
Sufco 006 (South Fork Quitcupah Creek)	9-Oct-1989	63	14	857	7.9	426	63.88	33.32	44.46		374	0	87	2.9	0.67	0.03	0.13	0.08
Sufco 006 (South Fork Quitcupah Creek)	23-May-1990	5	17.4	814	7.6	492	69.76	38.54	66.47		407	0	98	34	0.24	0.03	0.01	0.01
Sufco 006 (South Fork Quitcupah Creek)	20-Aug-1990	12	17.3	973	8.4	628	75.96	43.98	57.21		392	0	102	23.3	0.03	0.03	0.02	
Sufco 006 (South Fork Quitcupah Creek)	15-Oct-1990	3	12.1	964	7.8	598	42.4	23.72	43.46		468	0	93.5	24.8	0.27	0.03	0.06	0.04
Sufco 006 (South Fork Quitcupah Creek)	29-May-1991	18	21.3	912	8.01	564	50.43	43.29	73.15		382	0	115	32.5	0.21	0.505	0.09	0.03
Sufco 006 (South Fork Quitcupah Creek)	27-Aug-1991	166	14.8	434	8.07	422	67.56	33.31	34.62		285	0	100	8.3	0.48	0.05	0.05	0.04
Sufco 006 (South Fork Quitcupah Creek)	3-Oct-1991	9	15.2	893	7.8	538	41.08	44.75	66.96		431	0	100	37	0.06	0	0.03	0.03
Sufco 006 (South Fork Quitcupah Creek)	12-May-1992	18	15.5	686	8.1	544	63.03	48.09	64.77		399	0	93	26	1.33	0	0.09	0
Sufco 006 (South Fork Quitcupah Creek)	4-Aug-1992	94	17.9	735	7.84	452	52.1	30.1	36.6	2.97	282	0	100	11.3	1	0.13	0.04	0.01
Sufco 006 (South Fork Quitcupah Creek)	6-Oct-1992	7	10.7	1044	8.08	580	80.4	47.4	68.7		358	0	126	35.2	0.08	0.05	0.02	0.02
Sufco 006 (South Fork Quitcupah Creek)	9-Jun-1993	45	18.4	1032	8.22	602	71.8	41.8	88.2		468	0	101	33.1	0	0	0.05	0.029
Sufco 006 (South Fork Quitcupah Creek)	11-Aug-1993	25	19.7	641	8.36	344	62.3	36.7	24.7		247	6.9	78.9	6.88	0	0	0.023	0.02
Sufco 006 (South Fork Quitcupah Creek)	4-Oct-1993	16	15.4	943	7.95	568	67.4	45	66.7		372	0	112	21.3	0.018	0	0.018	0
Sufco 006 (South Fork Quitcupah Creek)	8-Jun-1994	0	20.8	865	8.44	586	46.7	34.7	71.5		380	0	114	35	0.285	0.03	0.019	0
Sufco 006 (South Fork Quitcupah Creek)	23-Aug-1994	85	20.2	775	8.18	442	77	40	48		278	0	93	13	1.54	0.02	0.06	0.03
Sufco 006 (South Fork Quitcupah Creek)	6-Jun-1995	45	16.1	977	8.07	570	73	35	78	4	420	0	95	33	0.3	0	0	0
Sufco 006 (South Fork Quitcupah Creek)	24-Aug-1995	13	16	578	8.46	320	56	32	18		235	20	73	6	0.2	0	0	0
Sufco 006 (South Fork Quitcupah Creek)	3-Oct-1995	193	12.5	636	8.2	360	57	33	19	1	275	0	66	7	0.1	<.1	<.1	<.1
Sufco 006 (South Fork Quitcupah Creek)	27-Aug-1996	130	15.9	635	8.35	378					317	23	72	8	0.3	<.1	<.1	<.1
Sufco 006 (South Fork Quitcupah Creek)	22-Oct-1996	9	1.02	398	8.28	450					440.14	<5.	81	14	0.3	<.1	<.1	<.1
Sufco 006 (South Fork Quitcupah Creek)	2-Jun-1997		21.53	805	8.3	460					469.4	<5.	86	19	0.9	<.1	<.1	<.1

Site	Date	Flow gpm	Water T °C	Cond µS/cm	pH	TDS mg/L	Ca ²⁺ mg/L	Mg ²⁺ mg/L	Na ⁺ mg/L	K ⁺ mg/L	HCO ₃ ⁻ mg/L	CO ₃ ²⁻ mg/L	SO ₄ ²⁻ mg/L	Cl ⁻ mg/L	Fe(T) mg/L	Fe(D) mg/L	Mn(T) mg/L	Mn(D) mg/L
Sufco 006 (South Fork Quitcupah Creek)	18-Aug-1997	287	18.9	574	8.44	350					251	<5	77	5	0.8	<.1	<.1	31
Sufco 006 (South Fork Quitcupah Creek)	8-Oct-1997	184	5.5	629	8.35	380					287	<5	92	9	0.6	<.1	<.1	32
Sufco 006 (South Fork Quitcupah Creek)	4-Jun-1998	112	13.1	901	8.42	269	66	40	72	2	456	<5	95	32	1.1	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	3-Aug-1998	224	22.75	577	8.08	359	55	31	17	2	135	72	70	5	1.4	<.01	<.01	
Sufco 006 (South Fork Quitcupah Creek)	1-Oct-1998	72	11.54	626	8.33	380	54	34	23	2	292	<5	70	9	0.5	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	21-Jun-1999	201	17.3	625	8.19	353	55	33	17	1	290	5	73	5	1.5	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	9-Aug-1999	394	22.04	592	8.3	338	50	31	17	1	273	6	70	5	4.1	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	4-Oct-1999	193	12.11	647	8.3	364	54	32	21	1	275	6	88	6	0.6	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	21-Jun-2000	0.8	15.32	627	8.13	374	53	32	18	1	258	9	94	5	3.7	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	2-Aug-2000	193	21.3	600	8.39	364	51	32	16	2	263	<5	89	4	2.9	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	5-Oct-2000	180	9	747	8.12	399	59	35	34	2	323	<5	90	13	0.5	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	11-Jun-2001	646	17.5	592	8.34	330	53	30	13	<1	237	8	96	3	1.2	<.1	<.1	
Sufco 006 (South Fork Quitcupah Creek)	20-Aug-2001	179	16.3	512	8.76	354	49	31	15	1	232	9	84	3.3	1.5	<.1	<.05	
Sufco 006 (South Fork Quitcupah Creek)	2-Oct-2001	0																
Sufco 006 (South Fork Quitcupah Creek)	8-May-2002	88	10.4	621	8.28	388	63	35	29	2	291	8	107	7	1.9	<.1	<.05	
Sufco 006 (South Fork Quitcupah Creek)	20-Sep-2002	12	16.8	721	8.47	402	63	33	37	3	301	7	107	11	2	<.1	<.05	
Sufco 006 (South Fork Quitcupah Creek)	8-Oct-2002	35	10.8	738	8.2	417	64	35	32	2	297	8	114	10	0.5	<.1	<.05	
Sufco 006 (South Fork Quitcupah Creek)	29-May-2003	0.91	20.9	962	8.42	571	66.1	43.2	80.1	3.77	371	<5	152	34	1.16	0.006	0.013	
Sufco 006 (South Fork Quitcupah Creek)	19-Sep-2003	26	13.5	631	8.53	458	63.4	35.5	28.9	2.25	285	10	108	9	0.447	0.009	0.005	
Sufco 006 (South Fork Quitcupah Creek)	30-Oct-2003	0.13	8.8	1228	8.58	828	94.7	56.4	110	6.47	549	<5	203	45	0.162	0.008	0.021	
Sufco 006 (South Fork Quitcupah Creek)	26-Jun-2004	420	13	493	8.77	302	50.9	30.4	10.9	1.01	184	16	95	3	1.9	<.03	0.006	
Sufco 006 (South Fork Quitcupah Creek)	1-Sep-2004	132	16.9	529	8.72	324	54	31.7	12.8	1.59	173	21	93	4	0.05	<.03	0.005	
Sufco 006 (South Fork Quitcupah Creek)	15-Oct-2004	70	9.6	593	8.47	362	56.5	31.5	20.2	1.79	218	<5	109	5	0.37	<.03	0.003	
Sufco 006 (South Fork Quitcupah Creek)	13-Jun-2005	703	15.5	523	8.37	312	63	34.8	15.4	2.17	282	<5	82	4	7.64	<.03	<.002	
Sufco 006 (South Fork Quitcupah Creek)	30-Sep-2005	402	12.1	542	8.57	338	52.2	32.6	14.5	1.35	215	16	98	3	0.77	<.03	0.007	
Sufco 006 (South Fork Quitcupah Creek)	24-Oct-2005	19	8.5	719	8.53	425	63.5	34	36.9	1.58	314	<5	93	13	<.05	<.03	0.006	
Sufco 006 (South Fork Quitcupah Creek)	26-Jun-2006	363	16.8	522	8.54	335	56.1	32.7	12.4	1.05	245.22	<5	77	4	2.93	<.03	<.002	
Sufco 006 (South Fork Quitcupah Creek)	13-Sep-2006	155	14.6	536	8.45	320	52.79	31.18	16.58	1.48	225	10	87	5	1.66	<.03	0.003	
Sufco 006 (South Fork Quitcupah Creek)	4-Nov-2006	90	3.9	591	8.48	350	59.61	34.32	28.01	1.2	281	<5	91	9	0.91	<.03	0.007	
Sufco 006 (South Fork Quitcupah Creek)	25-Jun-2007	160	17.6	543	8.62	351	55.1	33.8	14.3	0.93	244	<5	88	4	3.71	<.03	<.002	
Sufco 006 (South Fork Quitcupah Creek)	19-Sep-2007	95	12.3	515	8.89	330	50.2	33.7	17.1	1.72	128	79	95	4	0.19	<.03	0.003	
Sufco 006 (South Fork Quitcupah Creek)	29-Oct-2007	1	6.1	920	8.72	555	72.06	41.5	65.89	2.5	389	<5	122	25	0.23	<.03	0.007	
Sufco 006 (South Fork Quitcupah Creek)	12-Jun-2008	146	14.9	649	8.65	401	62.72	34.03	26.37	1.38	281.64	15	90	8	0.95	<.03	0.004	
Sufco 006 (South Fork Quitcupah Creek)	15-Sep-2008	104	11.9	518	8.63	345	56.09	33.36	14.57	1.36	224.34	<5	92	3	0.2	<.03	0.002	
Sufco 006 (South Fork Quitcupah Creek)	21-Oct-2008	1	7.2	882	8.44	578	81.24	45.53	76.47	3.87	412.09	<5	134	26	0.1	<.03	0.007	
Sufco 006 (South Fork Quitcupah Creek)	19-Jun-2009	80	16.5	617	8.46	391	65.11	35.56	25.93	1.64	273.1	26.667	95	7	2.33	<.03	0.007	
Sufco 006 (South Fork Quitcupah Creek)	17-Sep-2009	100	14.1	531	8.61	343	54.06	32.98	14.37	1.62	212.14	30	92	3	1.4	0.03	0.007	
Sufco 006 (South Fork Quitcupah Creek)	19-Nov-2009	71	0.3	612	8.39	361	56.79	34.34	21.27	1.83	256.04	<5	102	5	0.8	<.03	0.007	
Sufco 006 (South Fork Quitcupah Creek)	28-Jun-2010	433	18.8	576	8.43	372	57.6	32.99	14.8	4.21	250	<5	97	3	1.84	<.03	0.004	<0.002
Sufco 006 (South Fork Quitcupah Creek)	15-Sep-2010	50	11.2	532	8.42	372	55.4	31.5	20.4	2.2	297	12	98	4	1.26	0.03	0.034	<0.005
Sufco 006 (South Fork Quitcupah Creek)	1-Nov-2010	62	3.2	585	8.21	404	60.4	32.8	22.2	1.6	261	2	102	5	1.41	0.02	0.048	0.006
Sufco 006 (South Fork Quitcupah Creek)	17-Jun-2011	1116	9.5	525	8.74	322	55.4	29.6	14.2	1.1	275	4	69	4	1.3	<.02	0.057	<0.005
Sufco 006 (South Fork Quitcupah Creek)	21-Sep-2011	205	11.6	533	8.62	336	53.4	31.3	14.5	1.4	295	7	86	4	1.1	<.02	0.037	<0.005
Sufco 006 (South Fork Quitcupah Creek)	12-Oct-2011	155	6.4	578	8.62	366	55.7	32.2	17.2	1.5	317	3	88	4	0.59	<.02	0.024	<0.005
Sufco 006 (South Fork Quitcupah Creek)	1-Jun-2012	0.21	17.5	968	8.43	596	64.3	43.1	84.1	3.9	433	<1	135	27	0.24	<.02	0.010	<0.005
Sufco 006A	19-Oct-2009	75																
Sufco 006A	28-Jun-2010	500	16.8	538	8.51	360	56.93	32.42	12.89	1.54	224	13	95	2	1.27	<.03	0.072	<0.002

Site	Date	Flow gpm	Water T °C	Cond µS/cm	pH SU	TDS mg/L	Ca ²⁺ mg/L	Mg ²⁺ mg/L	Na ⁺ mg/L	K ⁺ mg/L	HCO ₃ ⁻ mg/L	CO ₃ ²⁻ mg/L	SO ₄ ²⁻ mg/L	Cl ⁻ mg/L	Fe(T) mg/L	Fe(D) mg/L	Mn(T) mg/L	Mn(D) mg/L
Sufco 006A	15-Sep-2010	51	11.7	529	8.44	366	48.3	29	16.1	2.6	296	7	99	4	0.58	0.02	0.023	0.008
Sufco 006A	1-Nov-2010	82	3.4	560	8.22	362	53.5	29.8	17.8	1.3	251	2	101	4	0.72	0.02	0.039	0.013
Sufco 006A	17-Jun-2011	1109	9.5	512	8.77	312	56.1	30.1	13.2	1.0	267	4	68	4	0.58	<0.02	0.035	<0.005
Sufco 006A	21-Sep-2011	296	11.7	524	8.68	348	47.5	28.8	12.0	1.1	293	8	86	3	0.78	<0.02	0.031	<0.005
Sufco 006A	12-Oct-2011	186	7.9	558	8.60	342	54.0	31.6	15.3	1.3	307	2	86	4	0.32	<0.02	0.019	<0.005
Sufco 006A	1-Jun-2012	0.95	14.3	1182	8.50	776	64.7	37.0	151	2.5	506	4	183	47	0.74	<0.02	0.016	0.006
Sufco 006B	19-Oct-2009	65																
Sufco 006B	28-Jun-2010	433	18.5	553	8.45	375	58.18	33.19	14.68	1.8	234	<5	96	3	2.21	<0.03	0.117	<0.002
Sufco 006B	15-Sep-2010	39	11.1	537	8.47	376	49.7	28.3	17.8	1.7	296	12	99	4	1.09	0.02	0.027	<0.005
Sufco 006B	1-Nov-2010	73	3.0	585	8.17	396	56.9	30.8	21.8	1.6	261	3	101	5	1.17	0.02	0.038	0.006
Sufco 006B	17-Jun-2011	900	9.8	519	8.74	328	55.1	29.5	14.4	1.1	277	4	69	4	1.64	<0.02	0.059	<0.005
Sufco 006B	21-Sep-2011	260	11.5	537	8.64	356	50.3	29.6	13.2	1.1	302	8	87	3	1.2	<0.02	0.038	<0.005
Sufco 006B	12-Oct-2011	173	6.3	583	8.61	370	55.1	32.1	16.8	1.5	319	3	87	4	0.63	<0.02	0.023	<0.005
Sufco 006B	1-Jun-2012	0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Sufco 006C	17-Jun-2011	951	10.9	511	8.84	300	54.1	28.4	13.9	1.1	272	5	68	4	2.43	0.06	0.195	0.008
Sufco 006C	21-Sep-2011	263	7.9	533	8.71	350	50.9	30.0	13.2	1.2	306	5	86	3	1.47	<0.02	0.042	<0.005
Sufco 006C	12-Oct-2011	156	3.8	583	8.86	384	58.4	33.6	17.5	1.5	319	5	87	4	0.53	<0.02	0.015	<0.005
Sufco 006C	1-Jun-2012	0	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Springs																		
Sufco 006A Spring	28-Jun-2010	0.28	5.3	1,302	7.39													
Sufco 006A Spring	15-Sep-2010	0.19	6.5	1,255	7.29													
Sufco 006A Spring	1-Nov-2010	0.27	5.6	1,227	7.17	832	63.2	24.8	205	3.4	605	<1	151	37	0.59	<0.02	0.012	<0.005
Sufco 006A Spring	17-Jun-2011	0.44	4.5	1,261	7.66	796	59.3	23.4	206	3.3	644	<1	150	38	0.14	<0.02	<0.005	<0.005
Sufco 006A Spring	21-Sep-2011	0.30	6.5	1,277	7.47	816	59.6	23.3	190	3.4	713	<1	135	36	0.09	<0.02	<0.005	<0.005
Sufco 006A Spring	12-Oct-2011	0.37	6.1	1,298	7.68													
Sufco 006A Spring	1-Jun-2012	0.39	4.4	1,263	7.36	800	62.1	24.8	207	3.4	629	<1	137	37	0.29	<0.02	<0.005	<0.005
Roberts Spring	17-Jun-2011	0.246	4.2	1,023	7.54													
Roberts Spring	21-Sep-2011	0.221	6.7	1,126	7.46													
Roberts Spring	12-Oct-2011	0.231	6.5	1,130	7.54													
Roberts Spring	1-Jun-2012	0.197	4.7	1,125	7.60	658	78.4	27.7	113	3.5	496	<1	145	41	0.47	<0.02	0.011	<0.005
RS-A	1-Jun-2012	0.077	7.5	1,145	7.81													
RS-B	1-Jun-2012	<0.05	8.8	1,139	7.83													
94-113	23-Apr-2012	0.1 (est)	---	---	---													
94-113	1-Jun-2012	0	---	---	---													
Hansen Seep	23-Apr-2012	0.356	11.3	1,489	7.63	974	124	38.4	158	3.3	501	<1	228	118	1.06	0.48	0.277	0.279
In-Mine groundwaters																		
2S Bleeder	16-Dec-2011	5 est.	13.7	536	7.66	308	61.1	27.6	19.6	1.9	276	<1	49	14	0.42	<0.02		
2R2S	16-Dec-2011	50 est.	12.6	570	7.75	304	65.3	27.9	10.0	1.9	258	<1	57	12	0.14	<0.02		
1R2L E1XC45 Fault	23-Feb-2012	500 est.	12.8	688	7.54	466	74.1	28.4	19.9	1.8	320	<1	101	15	0.63	<0.02	0.017	0.014

Table 4 Tritium contents of Sufco Mine groundwaters near the South Fork of Quitchupah Creek.

Site	Date	Tritium (^3H) TU	eTU
2 Right 2 South (fracture)	16-Dec-11	-0.01	0.09
2 South Bleeder 16	16-Dec-11	0.09	0.09
1RT 2STH E1XC45 Fault	23-Feb-12	0.00	0.09

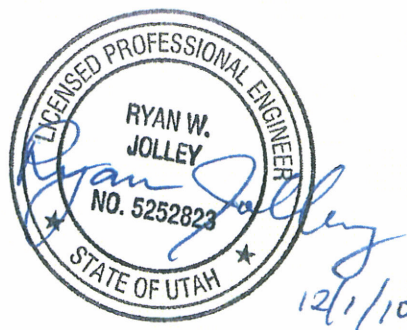


SCALE: 1" = 125'

[illegible]

December 1, 2010

Canyon Fuel Company, LLC
SUFCO Mine
597 South SR24
Salina, UT 84654



Attn: Leland Roberts

Subject: Permeability Summary for South Fork Quitcupah Creek near Duncan Mtn.

Hydraulic conductivity, also called permeability, is a measure of continuous voids. It is not enough for a soil to have large voids. The voids must also be connected for water to flow through them. A permeable material permits a significant flow of water.

Sands and gravels are pervious while clays are considered relatively impervious.

Table 1: Typical Hydraulic Conductivities

Soil	Coefficient of Permeability, K, cm/sec	Degree of Permeability
Gravel	$> 10^{-1}$	Very High
Sandy Gravel, Clean Sand, Fine Sand	$10^{-1} > k > 10^{-3}$	High to Medium
Sand, Dirty Sand, Silty Sand	$10^{-3} > k > 10^{-5}$	Low
Silt, silty clay	$10^{-5} > k > 10^{-7}$	Very Low
Clay	$> 10^{-7}$	Virtually Impermeable

Knowing the coefficient of permeability of a soil can assist in determining how much water will flow through a layer of that soil. Darcy's Law, which describes the flow of a fluid through porous medium, enables this calculation.

$$Q = KiA$$

Where:

Q = flow rate

K = hydraulic conductivity

i = hydraulic gradient where $i = dh/dL$ for vertical flow

dh = depth from the water surface elevation to the base of the soil layer in question

dL = thickness of the soil layer

A = surface area of the soil layer

ENGINEERING

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Water Rights

MATERIALS TESTING



Example: A stream flowing 6 inches deep is 1-foot wide and ½ mile long. The amount of water seeping through a 2-foot thick stream bed that has a hydraulic conductivity of 2.5×10^{-7} cm/s is determined by:

$$Q = \left(2.5 \times 10^{-7} \frac{\text{cm}}{\text{s}} \right) \left(\frac{2 \text{ ft} + 6 \text{ inches}}{2 \text{ ft}} \right) (1 \text{ foot} \times 0.50 \text{ miles})$$

$$Q = 2.71 \times 10^{-5} \text{ ft}^3 \text{ per second (cfs)}$$

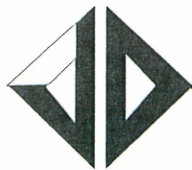
If the thickness of the stream bed were increased to 10 feet, then 2.27×10^{-5} cfs would seep through the layer. The amount of water flowing through a layer of material depends more on hydraulic conductivity and water depth than it does the thickness of the layer.

At the request of Canyon Fuel Company's Sufco Mine, Jones and DeMille Engineering, Inc. performed 4 separate hydraulic conductivity tests along a section of the South Fork of Quitchupah Creek. These tests were completed using a single ring infiltrometer. The single ring infiltrometer test gives the results for a soil's field-saturated hydraulic conductivity. The results of these tests are presented in Table 2. Samples taken at each of the sites were tested to determine the Atterberg Limits (liquid limit LL, and plasticity index PI) and the classifications of the soils. The results of each of the tests are also included in Table 2.

Table 2: Measured Hydraulic Conductivity

Site	Field-Saturated Hydraulic Conductivity (cm/s)	USCS Classification	Atterberg Limits (LL/PI)
Site 1	2.45×10^{-7}	CL	31/11
Site 2	1.40×10^{-7}	CL	35/15
Site 3	2.27×10^{-7}	CL	31/10
Site 4	2.36×10^{-7}	CH	57/31

The soil in each of these locations was found to be nearly impermeable with hydraulic conductivities representative of clay soils. The thickness of the soil layer in each location was found to be in excess of 2 feet thick and estimated to be at least several feet thick. The very low hydraulic conductivity rates in conjunction with the shallow stream depth indicate that there is very minimal seepage from the creek into subsurface layers below the tested sites.



FIELD PERMEABILITY TEST

JONES & DEMILLE ENGINEERING
1535 SOUTH 100 WEST
Richfield, Utah 84701
435-896-8266 Fax 435-896-0282

Project Name
Project Number
Test Location
Test Notes

Sufco Mine Permeability Tests
1008-167 Test Number 1
South Fork Quitchumpah, Creek 1 is furthest east, 4 is furthest west.
1:30 pm to 3:30 pm, temp 56 degrees F

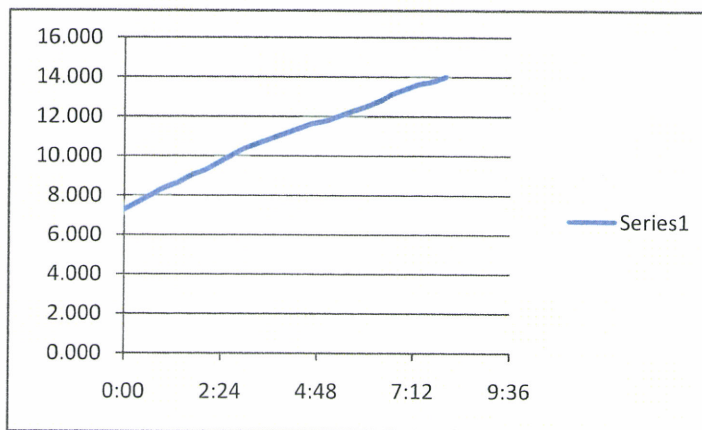
Date November 1, 2010

TEST DATA

	inches	cm
Depth to Wet Front, L	0.375	0.9525
Radius of Measuring Tube, Rt	0.13	0.3302
Radius of Permeameter Ring, Rr	5.06	12.8524
Height of Water, Ht	72	182.88

TIMED WATER DROP READINGS

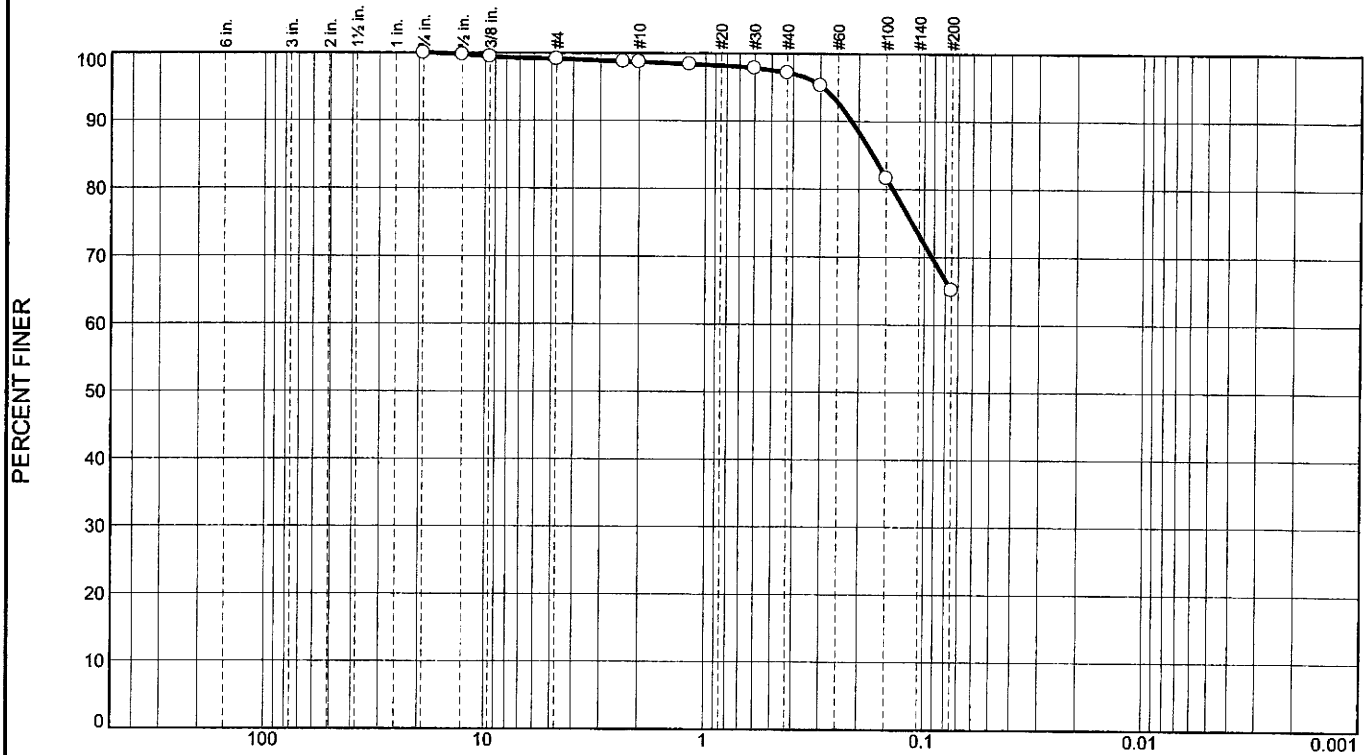
min:sec	inches	min:sec	inches
0:00	7.250	4:20	11.375
0:20	7.625	4:40	11.625
0:40	8.000	5:00	11.75
1:00	8.375	5:20	12
1:20	8.625	5:40	12.25
1:40	9.000	6:00	12.5
2:00	9.250	6:20	12.75
2:20	9.625	6:40	13.125
2:40	10.000	7:00	13.375
3:00	10.375	7:20	13.625
3:20	10.625	7:40	13.75
3:40	10.875	8:00	14
4:00	11.125		



RESULTS

	in/min	cm/sec
Change in Head/Time, dH/dT	0.84	0.035719
Ks	NA	2.45E-07

Particle Size Distribution Report



% +3"	% Gravel		% Sand			% Fines	
	Coarse	Fine	Coarse	Medium	Fine	Silt	Clay
0.0	0.0	0.9	0.4	1.6	31.9	65.2	

SIEVE SIZE	PERCENT FINER	SPEC.* PERCENT	PASS? (X=NO)
3/4	100.0		
1/2	99.8		
3/8	99.4		
#4	99.1		
#8	98.7		
#10	98.7		
#16	98.4		
#30	97.8		
#40	97.1		
#50	95.3		
#100	81.6		
#200	65.2		

* (no specification provided)

Material Description		
Native Clay, and top soil: sandy lean clay		
<div> <div> Atterberg Limits PL= 20 LL= 31 PI= 11 </div> <div> Coefficients D₉₀= 0.2158 D₅₀= D₁₀= C_u= </div> <div> Classification USCS= CL AASHTO= A-6(5) F.M.=0.30 </div> </div>		
Remarks		

Location: Native Clay Sample #1
Sample Number: S-1108a

Date: 11/16/10

**JONES & DEMILLE
ENGINEERING INC.
Richfield, Utah**

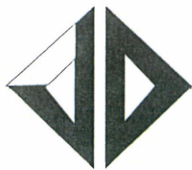
Client: Sufco mine
Project: Sufco mine

Project No: 1008-167

Figure

Tested By: Steve R Gossard

Checked By: Steve R Gossard



FIELD PERMEABILITY TEST

JONES & DEMILLE ENGINEERING
1535 SOUTH 100 WEST
Richfield, Utah 84701
435-896-8266 Fax 435-896-0282

Project Name
Project Number
Test Location
Test Notes

Sufco Mine Permeability Tests

1008-167

Test Number

Date

November 1, 2010

2

South Fork Quitchumpah, Creek 1 is furthest east, 4 is furthest west.

1:30 pm to 3:30 pm, temp 56 degrees F

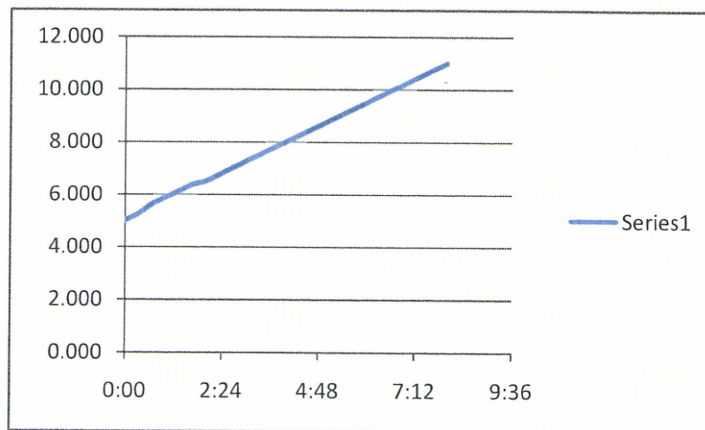
TEST DATA

inches cm

Depth to Wet Front, L	0.25	0.635
Radius of Measuring Tube, Rt	0.13	0.3302
Radius of Permeameter Ring, Rr	5.06	12.8524
Height of Water, Ht	74.5	189.23

TIMED WATER DROP READINGS

min:sec	inches	min:sec	inches
0:00	5.000	4:20	8.25
0:20	5.250	4:40	8.5
0:40	5.625	5:00	8.75
1:00	5.875	5:20	9
1:20	6.125	5:40	9.25
1:40	6.375	6:00	9.5
2:00	6.500	6:20	9.75
2:20	6.750	6:40	10
2:40	7.000	7:00	10.25
3:00	7.250	7:20	10.5
3:20	7.500	7:40	10.75
3:40	7.750	8:00	11
4:00	8.000		

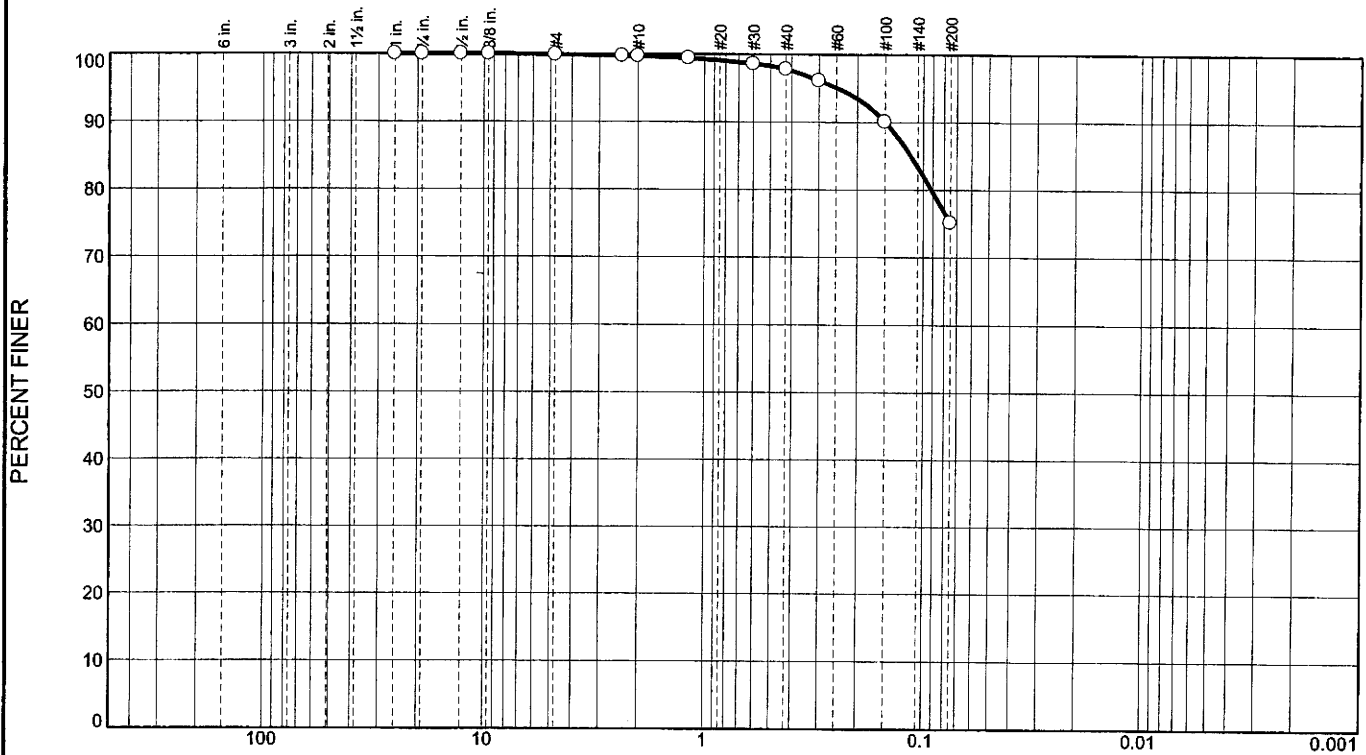


RESULTS

in/min cm/sec

Change in Head/Time, dH/dT	0.75	0.03175
Ks	NA	1.4E-07

Particle Size Distribution Report



% +3"	% Gravel		% Sand			% Fines	
	Coarse	Fine	Coarse	Medium	Fine	Silt	Clay
0.0	0.0	0.1	0.2	1.9	22.7	75.1	

SIEVE SIZE	PERCENT FINER	SPEC.* PERCENT	PASS? (X=NO)
1	100.0		
3/4	100.0		
1/2	100.0		
3/8	100.0		
#4	99.9		
#8	99.7		
#10	99.7		
#16	99.4		
#30	98.6		
#40	97.8		
#50	96.1		
#100	90.1		
#200	75.1		

* (no specification provided)

Material Description		
Native Clays and top soil lean clay with sand		
<div> <div> Atterberg Limits PL= 20 LL= 35 PI= 15 </div> <div> Coefficients D₉₀= 0.1491 D₅₀= D₁₀= C_u= C_c= </div> <div> Classification USCS= CL AASHTO= A-6(10) F.M.=0.16 </div> </div>		
Remarks		

Location: Native Clay Sample #2
Sample Number: S-1108b

Date: 11/12/10

**JONES & DEMILLE
ENGINEERING INC.
Richfield, Utah**

Client: Sufco mine
Project: Sufco mine

Project No: 1008-167

Figure

Tested By: Steve and Kent

Checked By: Steve R Gossard



FIELD PERMEABILITY TEST

JONES & DEMILLE ENGINEERING
1535 SOUTH 100 WEST
Richfield, Utah 84701
435-896-8266 Fax 435-896-0282

Date November 2, 2010

Project Name Sufco Mine Permeability Tests
Project Number 1008-167 Test Number 3
Test Location South Fork Quitchumpah, Creek 1 is furthest east, 4 is furthest west.
Test Notes 2:15 pm to 6:15 pm, temp 53 degrees F

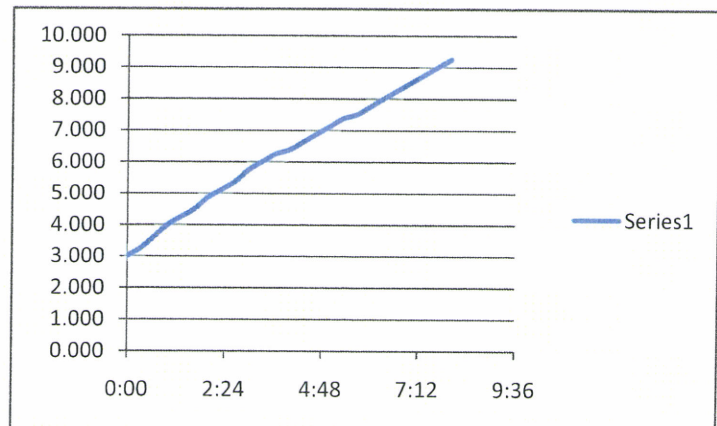
TEST DATA

inches cm

Depth to Wet Front, L	0.375	0.9525
Radius of Measuring Tube, Rt	0.13	0.3302
Radius of Permeameter Ring, Rr	5.06	12.8524
Height of Water, Ht	72	182.88

TIMED WATER DROP READINGS

min:sec	inches	min:sec	inches
0:00	3.000	4:20	6.625
0:20	3.250	4:40	6.875
0:40	3.625	5:00	7.125
1:00	4.000	5:20	7.375
1:20	4.250	5:40	7.5
1:40	4.500	6:00	7.75
2:00	4.875	6:20	8
2:20	5.125	6:40	8.25
2:40	5.375	7:00	8.5
3:00	5.750	7:20	8.75
3:20	6.000	7:40	9
3:40	6.250	8:00	9.25
4:00	6.375		

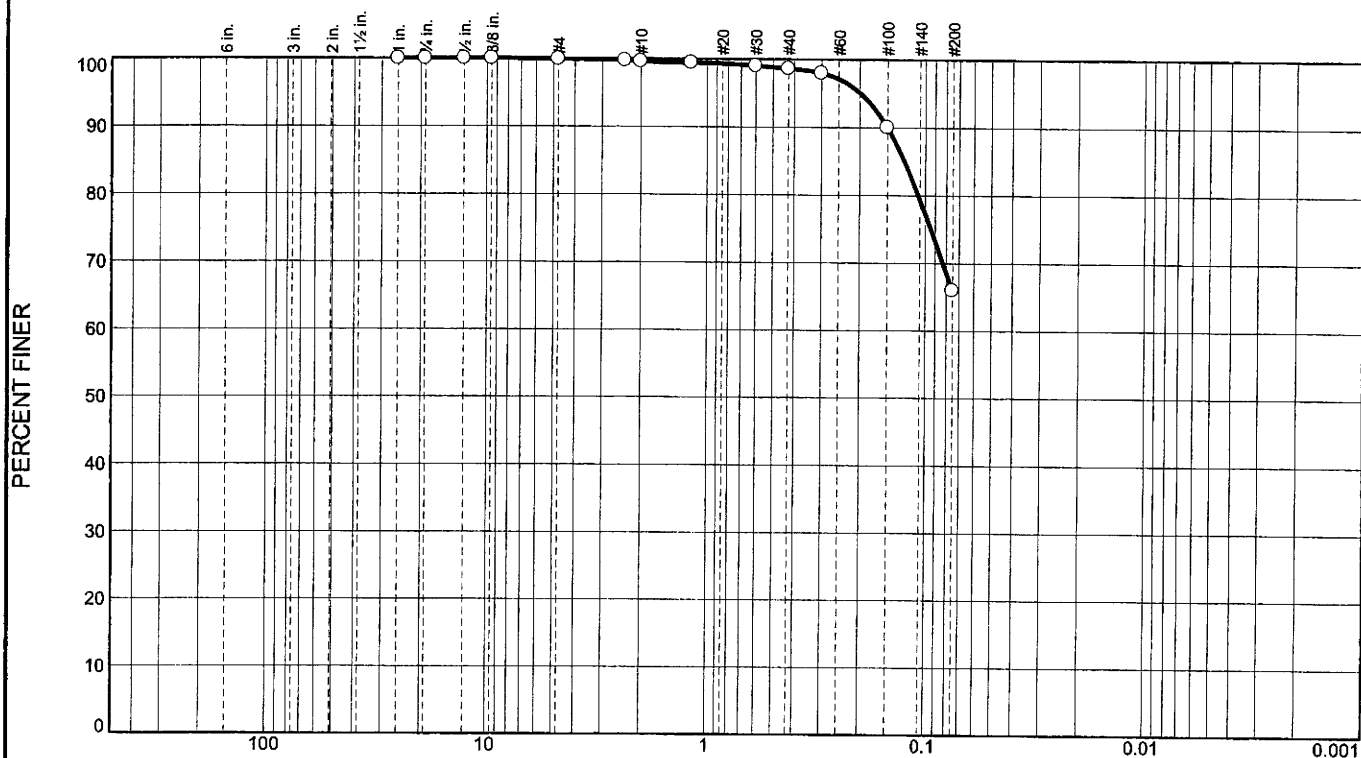


RESULTS

in/min cm/sec

Change in Head/Time, dH/dT	0.78	0.033073
Ks	NA	2.27E-07

Particle Size Distribution Report



% +3"	% Gravel		% Sand			% Fines	
	Coarse	Fine	Coarse	Medium	Fine	Silt	Clay
0.0	0.0	0.1	0.3	1.0	32.6	66.0	

SIEVE SIZE	PERCENT FINER	SPEC.* PERCENT	PASS? (X=NO)
1	100.0		
3/4	100.0		
1/2	100.0		
3/8	100.0		
#4	99.9		
#8	99.7		
#10	99.6		
#16	99.4		
#30	99.0		
#40	98.6		
#50	98.0		
#100	90.0		
#200	66.0		

* (no specification provided)

Location: Naive Clay Sample #3
Sample Number: S-1108c

Material Description

Native Clays and top soil: sandy lean clay

PL= 21

Atterberg Limits

LL= 31 PI= 10

D₉₀= 0.1499
D₅₀=
D₁₀=

Coefficients

D₈₅= 0.1251 D₆₀=
D₃₀= D₁₅=
C_u= C_c=

USCS= CL

Classification

AASHTO= A-4(5)

F.M.=0.14

Remarks

**JONES & DEMILLE
ENGINEERING INC.
Richfield, Utah**

Client: Sufco mine
Project: Sufco mine

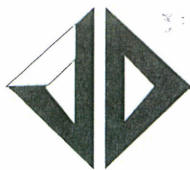
Project No: 1008-167

Date: 11/12/10

Figure

Tested By: Steve G

Checked By: Steve R Gossard



FIELD PERMEABILITY TEST

JONES & DEMILLE ENGINEERING
1535 SOUTH 100 WEST
Richfield, Utah 84701
435-896-8266 Fax 435-896-0282

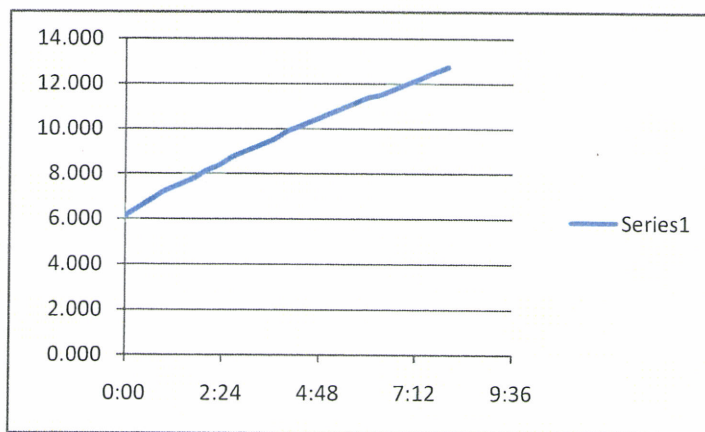
Project Name Sufco Mine Permeability Tests Date November 2, 2010
Project Number 1008-167 Test Number 4
Test Location South Fork Quitchumpah, Creek 1 is furthest east, 4 is furthest west.
Test Notes 2:00 pm to 6:00 pm, temp 53 degrees F

TEST DATA

	inches	cm
Depth to Wet Front, L	0.375	0.9525
Radius of Measuring Tube, Rt	0.13	0.3302
Radius of Permeameter Ring, Rr	5.06	12.8524
Height of Water, Ht	73.25	186.055

TIMED WATER DROP READINGS

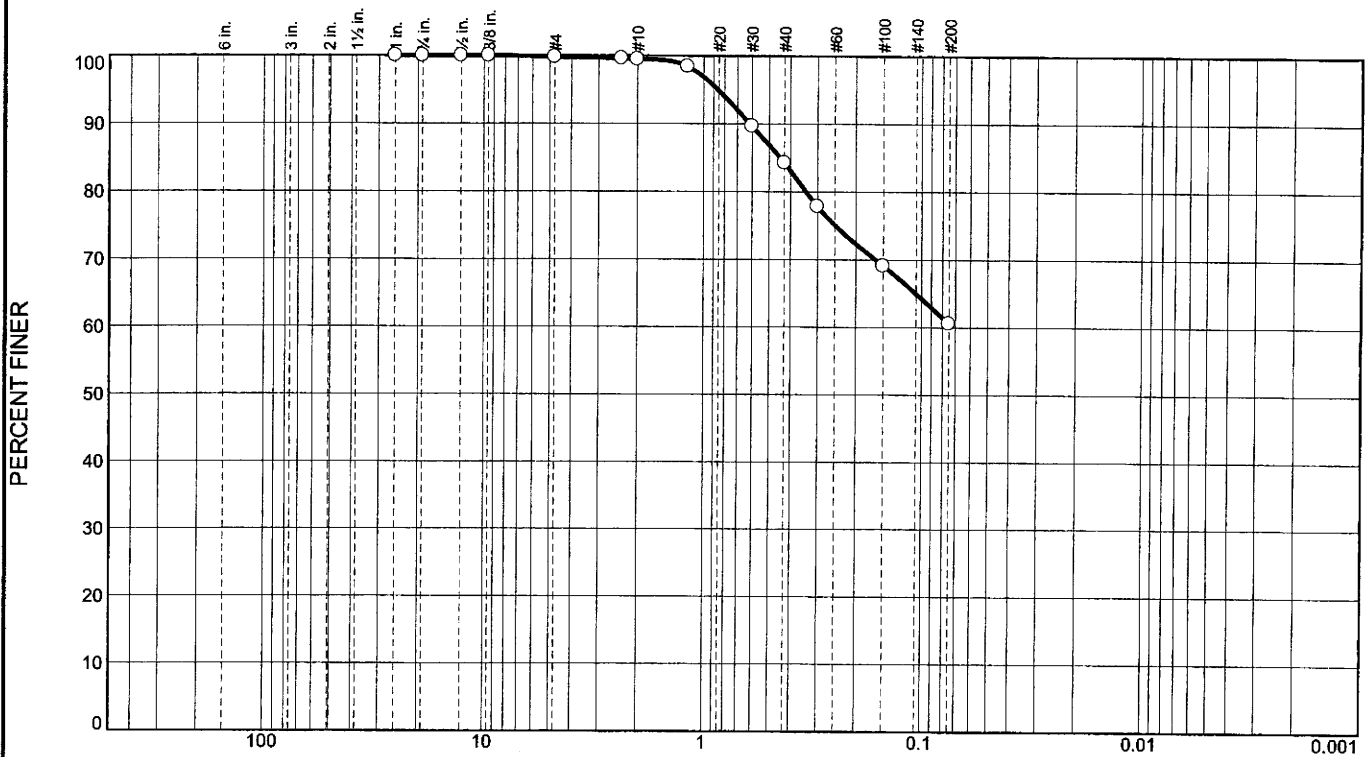
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0:00	6.125	4:20	10.125
0:20	6.500	4:40	10.375
0:40	6.875	5:00	10.625
1:00	7.250	5:20	10.875
1:20	7.500	5:40	11.125
1:40	7.750	6:00	11.375
2:00	8.125	6:20	11.5
2:20	8.375	6:40	11.75
2:40	8.750	7:00	12
3:00	9.000	7:20	12.25
3:20	9.250	7:40	12.5
3:40	9.500	8:00	12.75
4:00	9.875		



RESULTS

	in/min	cm/sec
Change in Head/Time, dH/dT	0.83	0.035057
Ks	NA	2.36E-07

Particle Size Distribution Report



% +3"	% Gravel		% Sand			% Fines	
	Coarse	Fine	Coarse	Medium	Fine	Silt	Clay
0.0	0.0	0.2	0.3	15.3	23.6	60.6	

SIEVE SIZE	PERCENT FINER	SPEC.* PERCENT	PASS? (X=NO)
1	100.0		
3/4	100.0		
1/2	100.0		
3/8	100.0		
#4	99.8		
#8	99.6		
#10	99.5		
#16	98.4		
#30	89.7		
#40	84.2		
#50	77.8		
#100	69.1		
#200	60.6		

* (no specification provided)

Material Description		
Native clays and top soil: sandy fat clay		
Atterberg Limits		
PL= 26	LL= 57	PI= 31
Coefficients		
D ₉₀ = 0.6134	D ₈₅ = 0.4445	D ₆₀ =
D ₅₀ =	D ₃₀ =	D ₁₅ =
D ₁₀ =	C _u =	C _c =
Classification		
USCS= CH	AASHTO=	A-7-6(17)
Remarks		
F.M.=0.66		

Location: Native Clay sample #4
Sample Number: S-1108d

Date: 11/12/10

**JONES & DEMILLE
ENGINEERING INC.
Richfield, Utah**

Client: Sufco mine
Project: Sufco mine

Project No: 1008-167

Figure

Tested By: Steve G

Checked By: Steve R Gossard